Oregon Telecommunications Relay Service (OTRS) FCC Certification Renewal and Supporting Documents

Introduction

Oregon Telecommunications Relay Service (OTRS), a program under the State of Oregon Public Utility Commission (PUC) has prepared the following narrative and attached appendices to comply with the FCC TRS Certification Renewal Application, specifically in response to the **FCC Public Notice DA 12-1187, CG Docket No. 03-123** released on July 25, 2012. Included in the Public Notice are the minimum mandatory FCC TRS requirements under **47 C.F.R. §64.604 and §64.606.** A copy of this Public Notice and these mandatory requirements is attached as **Appendix A. OTRS** prepared this TRS Certification Renewal Application with the assistance of Sprint Relay.

The State of Oregon contracted with Sprint to provide the Oregon Telecommunications Relay Service effective July 31, 2010 to provide operational, technical, and functional standards pertinent to the FCC mandates as specified in 47 C.F.R. §64.604 and §64.606. Included with this TRS Certification Renewal Application is a copy of the contract that was issued on July 29, 2010. All of the minimum mandatory TRS requirements for are listed in the contract and is attached as **Appendix F.** Please note that although Sprint Relay provides Internet Protocol (IP) and Captioned telephone web-based services, PUC does not contract to provide these services in Oregon, nor is the PUC responsible for oversight of IP and VRS or other Internet or web-based relay services.

The FCC has requested that each FCC TRS Certification Renewal application respond to the minimum mandatory FCC TRS requirements for providing telecommunication relay services and that each state includes procedures and remedies for enforcing any requirements imposed by state programs. Additionally, the FCC requested that several exhibits such as outreach presentations, promotional items, consumer training materials, and consumer complaint logs be included with the information provided.

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Appendices

Operational Standards

A.1 Communication Assistants (CAs)

§64.604 (a)(1) (i) TRS Providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communication needs of individuals with hearing and speech disabilities

CA Employment Standards

OTRS contracts with Sprint to provide the hiring, training and oversight of CAs for OTRS. Sprint has established a successful procedure to attract qualified applicants for TRS CA positions. Sprint's Quality Assurance team has developed comprehensive hiring and training programs that prepare employees for the challenging position as a CA and ensures all communications are of the highest quality. Employees continue to expand their knowledge of TRS and the importance of providing quality services to the consumers they serve throughout their employment as a CA. CAs are required to have a high school diploma or GED, which ensures that the applicant has at least a twelfth-grade level of English grammar and spelling skills, the ability to type 60 words-per-minute on an auditory-based test, clear articulation and an intelligible, pleasant speaking voice.

Preference is given to CA applicants with TRS experience, knowledge of American Sign Language, or experience working with individuals who are deaf, hard of hearing or have a speech disability.

All applicants for CA positions are required to submit an employment application that details the applicant's educational and employment history.

After an applicant's educational history, employment history and typing test results are reviewed, a determination is made as to whether the applicant meets the minimum CA requirements.

A Human Resources representative then screens potential candidates through face-to-face and telephone interviews to evaluate the applicant's communication skills, including English grammar, diction and speech clarity, sensitivity to issues of customer service, integrity and confidentiality, and overall suitability for the job. Those applicants who do not pass the HR screening interview will not be considered for employment.

Sprint TRS CA applicants are required to pass a valid and unbiased 12th grade level spelling and grammar test to be considered for employment.

Once the applicant passes the HR screening interview, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. These dimensions include sensitivity to customers and issues of confidentiality.

If the Supervisor recommends the applicant for employment, the applicant must pass a drug screen and a background investigation of educational, work and criminal histories.

This process ensures that only qualified applicants are hired to work at Sprint TRS centers as a CA.

Sprint provides an enhanced Voice Carry-Over (VCO) service called Captioned Telephone (CapTel) Relay Services. Sprint requires that all CapTel CAs have a high school graduate equivalency as a minimum qualification for the job. Sprint ensures that all CapTel CAs are sufficiently trained to meet the needs of CapTel users. Trainees must demonstrate adequate skill level in all aspects of call processing prior to graduation from training. CapTel Relay Trainees must also demonstrate a strong proficiency in the primary required skill-set of re-voicing for CapTel calls.

- CapTel CA Trainees spend 2 to 3 weeks training in a classroom setting.
- There is a final proficiency exam that must be passed in order to move into a live call environment.
- Upon completion of classroom training, CapTel CAs are scheduled for one-week of transition training, while being monitored and supported by another CapTel CA or an Instructor.
- All CapTel CAs must continue to qualify for live call handling each month.
- Sprint CapTel CAs are routinely coached on Call Center ergonomics, call handling procedures, and confidentiality.
- Each CapTel CA is evaluated on a minimum of one call each shift.
- There is also a monthly test that each CapTel CA must pass in order to remain qualified to caption live calls.

§64.604 (a)(1)(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

The PUC, through its contract with Sprint, has shown that that Sprint CAs have competent skills in typing, grammar, spelling, interpretation of written ASL and familiarity with hearing and speech disability cultures, languages and etiquette. Sprint requires all CAs to possess clear and articulate voice communications. CAs are given five (5) written and three (3) hands-on performance evaluations demonstrating the ability to process calls. Sprint CAs must demonstrate TRS skill level in all aspects of call processing prior to graduation from training. CAs must demonstrate their ability to:

- Type 60 WPM prior to taking live calls and post training, they must demonstrate the ability to maintain a minimum typing speed of 60 wpm on an auditory test.
- Understand information about TRS users including deaf users and their culture, history, and communication needs. Sprint's diversified culture training program also incorporates training and the characteristics of hard-of-hearing and late-deafened users, deaf/blind and speech-disabled users.
- Demonstrate a professional and courteous phone image.

- Process calls using live training terminals in an efficient and knowledgeable manner
- Role-play scenarios written in varying levels of ASL

Sprint provides an extensive process for hiring CAs who provide Speech to Speech (STS). CA applicants must successfully achieve the following:

- Six months of employment as a CA.
- Recommendation and/or approval from supervisor or manager.
- Attend and complete specialized Speech-to-Speech training program including a written evaluation.
- Proficiency in all areas of TRS call processing including grammar, enunciation and vocabulary.
- Hearing acuity test administered by an audiologist using calibrated equipment to perform a speech recognition test and pure tone test.

STS applicants who meet these qualifications receive additional training specifically on STS. Sprint's STS training is delivered by individuals with professional experience related to speech disabilities and/or consumer experts and is based on adult learning theories.

STS applicants who meet all qualifications for the STS training program receive eight hours of classroom training specifically on Speech-to-Speech services. Sprint's STS training program has been developed based on direct experience and consultation with Dr. Bob Segalman obtained during the initial STS trial conducted along with eight years of experience processing STS calls.

The STS training outline includes specific strategies used to facilitate communication without interfering with the STS user's control over the call including retention of information at the user's request and verification of what is said to verify accuracy.

The STS training outline is displayed in the following figure:

STS TRAINING OUTLINE	
Sprint Values and Goals	
Training Agenda	
▪ Objectives / Training Outline ▪ Introduction and History ▪ Video ▪ Service Description ▪ Characteristics of Customers ▪ Stereotypes	▪ Speech-Disabilities ▪ Attributes of Speech-to-Speech Relay CAs ▪ Speech-to-Speech verses Traditional Relay ▪ FCC Requirements ▪ Speech-to-Speech Variations ▪ Assessment
Work Performance Components	
▪ Basic Call Processing ▪ Call set up ▪ Customer Database ▪ Frequently Dialed Numbers ▪ Customer Requests ▪ Emergency Call Processing	▪ Confidentiality ▪ Transparency ▪ Personal Conversations ▪ Developmental Skill Practice ▪ Audio ▪ Observation
Participation	

STS TRAINING OUTLINE	
Sprint Values and Goals	
▪ CA training ▪ Taking over calls – 15 minute ▪ CA work performance	▪ Call Focus ▪ Teamwork – support peer
♦ **Confidentiality and Transparency**	♦
▪ Discuss call speech patterns ▪ Discuss techniques customer uses ▪ Have two CAs on one call, if necessary or customer requests.	▪ Unacceptable to: ▪ Have conversation regarding information discussed on calls ▪ Discuss customers in general
♦ **Scheduling**	♦

All CapTel CAs are tested and competent in typing, grammar, and spelling to ensure skills meet the following FCC Guidelines. CapTel CA training provides familiarity with hard of hearing, deaf, and speech-disabled cultures.

Personnel supporting CapTel have the requisite experience, expertise, skills, knowledge, training, and education to perform CapTel Relay Services in a professional manner. CapTel CA Trainees are screened on several skill-sets to be considered for hire. Several tests are administered to evaluate for skills in the following:

- Spelling
- Pronunciation
- Enunciation
- Reading Ability
- Vocabulary
- Error Recognition - CapTel CAs must be able to recognize a mistake in voice-recognition and be able to appropriately correct errors while on a call

A captioned telephone user does not type during CapTel calls; therefore, it is not necessary for the CA to interpret typewritten ASL.

Please review the Sprint TRS, STS and CapTel Training outlines in **Appendix B** for more information on CA training requirements.

CA Quality Assurance Programs

Sprint Relay Quality Assurance Managers coordinate all training curriculum and policies with the call center Quality Team Leaders and Assistant Trainers to ensure that consistent quality is maintained throughout the TRS network of relay centers. The Sprint Quality Assurance Managers and the call center training teams meet weekly to receive updates, discuss changes and voice concerns and how to address them. The training team is located in seven (7) Relay Centers across the country. This team along with the support of the Location Managers, Supervisors and

CAs has just one goal: to provide excellent service to our customers. In addition, Sprint listens to customers' feedback and takes proactive steps to implement suggestions and input. Sprint Relay does not develop training and consumer education programs for TRS alone. Sprint Relay contracts with members of the deaf, hard of hearing, deaf-blind and speech-disabled communities to jointly develop and present training of all TRS programs.

§64.604 (a)(1)(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

Transmission of 60 WPM

The PUC contracts with Sprint to provide a comprehensive Quality Assurance program focusing strictly on typing speed and accuracy. As a part of this program, Sprint conducts pre-employment testing and internal testing (quarterly) using a five-minute oral-to-type test that simulates actual working conditions and the relay environment. Internal testing on typing speeds demonstrated that Sprint's CAs typed an average of 83.9 words per minute (wpm), with at least 95% accuracy. In fact, almost a third of Sprint's CAs type over 90 wpm!

§64.604 (a)(1)(iv) TRS providers are responsible for requiring that VRS CAs are qualified interpreters. A "qualified interpreter" is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Qualified Video Relay Services (VRS) interpreters

The PUC does not contract to provide VRS services, nor is the State of Oregon responsible for the oversight of VRS. As of January 2012, Sprint no longer provides VRS services.

§64.604 (a)(1) (v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

In-Call Replacement of CAs

Through their contract with Sprint, the PUC exceeds all FCC minimum requirements regarding changing CAs during a call. As a matter of practice at Sprint, calls are not taken-over unless it is absolutely necessary to do so. Sprint CAs are trained to use on screen clocks to identify the total amount of time since the call arrived at the CA position. After 10 minutes with the TRS (15 minutes with STS) inbound customer, a CA may be relieved if it is appropriate. The only situations in which a CA would transition during a call prior to the FCC minimum standard of ten minutes include:

- The customer requests a CA of the opposite gender or different CA,
- End user verbal abuse or obscenity towards the CA,
- Call requires a specialist (STS, Spanish, etc.),
- CA illness,

- At the request of the customer for any reason, and/or
- CA becomes aware of a conflict of interest such as identifying callers as friends or family.

In addition, there are situations which may require a CA to transition the call to a different CA, which is only approved after the CA has remained on the call longer than the FCC minimum standard of ten or fifteen minutes (for STS calls). These include:

- Shift change, and/or
- CA fatigue normally as a result of a call in progress more than 30 minutes with difficult call content or speed or 60 minutes or more of an average call.
- If transition of CAs is unavoidable, the change occurs with minimal disruption to either relay participant including the following:
    - Sprint attempts to honor any requests for a specific gender during call transitions.
    - The second CA silently observes the call long enough to learn the spirit of the call as well as reviewing any customer call handling preferences provided during the call and as a part of the Customer Profile.

§64.604 (a)(1)(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

As stated in the section above (§64.604 (a)(1) (v)) OTRS honors the requests of all callers when they request a specific CA gender. Relay users may request a specific CA gender through the Customer Profile or a per-call basis directly with the CA. The transfer of the CA to the requested gender occurs as soon as one is available. This requirement has been waived by the FCC for CapTel CAs.

§64.604(a)(1)(vii) TRS shall transmit conversations between TTY and voice callers in real time.

All conversations relayed between voice and TTY callers are transmitted in real-time. OTRS uses Sprint's Phoenix software, which provides tools and enhancements designed to allow conversations to be transmitted in real time, including the following:

- Automated answer
- CA-initiated macros (44 macros)
- Function Keys (85 separate function keys)
- System-initiated macros

- On-line help panel
- Tone of voice pre-approved descriptions (almost 100)
- Automatic Error Correction Library (615 words)
- Background descriptions (over 250)

All of these features are available in all languages including English and Spanish.

CapTel is a transparent service. CapTel CAs transmit audio and captioned text conversations from the voice caller to the CapTel user in real time. Since the CapTel user utilizes their own voice to transmit, no transmission occurs from the CA to the voice caller.

A.2 Confidentiality and Conversation Context

§64.604 (2)(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

Confidentiality Policies and Procedures

As stated earlier, the PUC contracts with Sprint to oversee all TRS CAs, including CapTel CAs for the State of Oregon.

In accordance with the FCC regulations, all information provided for the call set-up, including customer database records remain confidential and cannot be used for any other purpose. Once the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept once the call is released from the relay position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

The only exception to this policy relates to STS calls. OTRS STS relay CAs may retain information from one inbound call for use in a subsequent outbound call, with the caller's permission. Such information will only be retained for the duration of the inbound call.

The PUC's confidentiality expectations for OTRS are strictly enforced and employees are expected to comply with this policy during and after their period of employment. Sprint strictly enforces confidentiality policies in the center, which include the following:

- Prospective CAs undergo a thorough background investigation and screening.
- During initial training, CAs are presented with examples of potential breaches of confidentiality.

- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment.
- Breach of confidentiality will result in disciplinary action up to and including termination of employment.
- CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise-reducing headsets.
- All Sprint Relay Centers have security key access.
- Visitors are not allowed in relay work areas.
- Supervisors are present in the work area to observe behavior.
- All relay center personnel are required to sign and abide by the Sprint Relay Center's Agreement Regarding Confidential Customer Information.
- All employees attend annual confidentiality meetings wherein the confidentiality agreement is reviewed and re-signed.

Sprint Relay Center's Agreement Regarding Confidential Customer Information requires CAs to:

- Keep all call information confidential.
- Not edit or omit any content from the conversation.
- Not add or interject anything into the content or spirit of the conversation.
- Assure maximum user control.
- Continuously improve their skills.

OTRS CapTel CAs must comply with the same rules that TRS follows regarding confidentiality. The CapTel confidentiality form is similar to TRS. Below is an explanation of confidentiality as it pertains to Captel CAs.

Information obtained during a CapTel call is not shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer, or customer service issues. General call information is not shared unless it is used to clarify, vent, or teach. Information about call content is also discussed in a private area only.

Only information critical to resolving the situation is disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

When a CapTel CA has problems, complaints or stress from handling the call, the CapTel CA may ask to speak to a supervisor or other member of management (as long as it wasn't their call) in a private area.

The success of CapTel depends on quality and complete confidentiality. Since consumers are less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence, all CapTel CAs understand and abide by the confidentiality policy. Any CapTel CA who breaks this policy will be disciplined, up to and including termination. Please see **Appendix C** for the TRS pledge of Confidentiality.

STS Limited Exception of Retention of Information

At the request of a caller, OTRS Speech-to-Speech (STS) CAs retain information from a call in order to facilitate the completion of consecutive calls. STS CAs may utilize the TRS system designed electronic scratchpad to aid the CA during the processing of a call or subsequent calls. No information is kept after the inbound call is released from the CA position. Please see **Appendix C** for the TRS Pledge of Confidentiality form.

§64.604 (2)(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

Verbatim Relay and the Translation of ASL

OTRS CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered, and at all times during the conversation, unless either relay user specifically requests summarization or ASL interpretation.

STS and TRS Training: OTRS puts control of the call with the users.

- CAs accept their involvement only to the point of facilitating communication as a "human telephone wire".
- CAs understand the relay user is to remain in control of the call.
- CAs do not make decisions or comments on behalf relay users.
- The user controls the call progress and content of the conversation.
- CAs re-voice/relay verbatim what is spoken, typed or heard.

At the request of the relay user, OTRS CAs will translate written ASL into conversational English. Training is provided on various levels of interpretation of typewritten ASL during initial training as well as throughout a CA's employment. In order to successfully complete initial training, the CA must demonstrate competent skills to accurately reflect the TTY user's intent and the CA's role in the relay process. CA trainees are required to pass a valid and unbiased written test to demonstrate that they can correctly interpret typewritten ASL phrases. Trainees must achieve a score of 80% or better before being allowed to complete training and process relay calls. After initial training, each CA is provided with an ASL workbook. This workbook is completed by the CA and returned to the supervisor. The supervisor and CA together review the workbook and the CA's ability to translate ASL to conversational English. The CA keeps this manual for future reference. A CA continues to be evaluated on translation skills through individualized monthly surveys.

OTRS CapTel CAs are prohibited from intentionally altering a relayed conversation and will relay all conversation verbatim. The State of Oregon does not have oversight of VRS services and does not contract with providers to process VRS calls, and is therefore exempt from ensuring VRS interpreters maintain confidentiality.

STS Facilitation of Communication

OTRS STS CAs facilitate communication without interfering with a caller's independence. They do not counsel, advise or interject personal opinions. OTRS STS CAs have received training on many techniques to clarify the STS user's message if the meaning or context is unclear. Sprint understands that each STS user may also find one technique to be most comfortable. Sprint STS CAs will follow these customer preferences to clarify while providing as smooth of a call flow as possible.

OTRS STS CAs do not guess what the STS user is saying and request clarification when unsure. When unsure of the meaning or context, the STS CAs ask the speech-disabled caller to repeat or clarify, especially if the meaning or context is unclear. Emphasis is placed on the intent and spirit of the message.

When necessary, STS CAs respectfully engage in open dialogue with the STS user while maintaining focus on the intent of the call. STS CAs may use multiple tactics to clarify a STS user's message. Many times, STS users have a preference on which tactic works best for him or her. When the STS user has a preference, the STS CA applies that tactic. Otherwise, the STS CA may clarify a message by asking:

- The STS user to repeat the word or phrase
- "Yes" or "No" questions
- The STS user to use the word in another sentence
- The STS user to provide a word that rhymes with the misunderstood word
- The STS user to spell the word

To ensure that STS CAs follow established call processing procedures, STS CAs are evaluated through individualized monthly surveys, tested randomly through the test call process, provided with customer feedback when available and observed by supervisors who are available in the STS CA work area to monitor performance. If a development area is identified in any area of call processing the STS CA will receive specific feedback and additional training. If the STS CA performance does not demonstrate improvement, progressive discipline up to and including termination may occur.

A.3 Types of Calls

§64.604 (3) (i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

OTRS provides 24 hour, 7 day-a-week TRS for standard (voice), TTY, wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. OTRS also processes calls to directory assistance and toll-free numbers. There are no restrictions on the

duration or number of calls placed by any relay user. All relay users accessing OTRS retain full control of the length and number of calls placed anytime through relay.

OTRS CapTel CAs are currently waived by the FCC for outbound calls because the CapTel CA is not involved in the call set up. Therefore, it is not possible for a CapTel CA to refuse sequential calls or limit the length of calls.

OTRS CapTel CAs are not waived by the FCC for inbound calls to a CapTel user made through a TRS facility. However, if a call is made directly to the captioned telephone access number, no set up is involved and the CapTel CA cannot refuse to call.

§64.604 (3)(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

The PUC and Sprint work in conjunction with the Local Exchange Carriers (LEC) to provide additional functionality for users of OTRS. Sprint processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. Sprint also processes OTRS calls to or from restricted lines such as hotel rooms and pay telephones.

All TRS and CapTel users are billed in the same manner that a non-relay user is billed. The relay user is billed for conversation time, (which does not include call setup time, time in between calls and wrap-up time) on toll calls. Billing occurs within 60 days of the call date. OTRS gives users the option of billing their calls to a local LEC or long-distance IXC on the users' calling cards. OTRS works with the LECs and IXCs to compile and make available to all TTY or CapTel users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through OTRS.

§64.604 (3) (iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

If a long-distance provider declines to complete a call because credit authorization is denied, OTRS CAs will relay the message verbatim to the relay user and follow the user's instructions.

§64.604 (3) (iv)Relay services shall be capable of handling pay-per-call calls.

Sprint was the first provider to process pay-per-calls, beginning in 1996. Callers to OTRS access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier(s) will rate and bill the user as if the call was dialed directly from the originating user's telephone. Currently, OTRS users may make 900 calls through 1-900-568-3323.

Because 900 blocking information is not available with CapTel phones, CapTel users who wish to place pay-per-calls from the CapTel phone must update their Customer Profile form to allow these calls.

§64.604 (3)(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

OTRS provides access to all available relay call types. Through the state's contact with Sprint, the state meets and in some cases exceeds the requirements for text-to-voice, voice-to-text, VCO, two-line VCO, VCO-to-TTY, VCO-to-VCO, HCO, two-line HCO, HCO-to-TTY, and HCO-to-HCO. Below is a list of services that are provided by OTRS:

- Text-to-Voice (TTY to Voice)
- Voice-to-Text (Voice to TTY)
- VCO Attribute-Based Routing
- VCO with Privacy/No GA
- VCO Branding
- Standardized or personalized VCO call announcement and explanation
- Two-Line VCO
- VCO-to-HCO
- VCO-to-TTY
- VCO-to-VCO
- Reverse Two-Line VCO
- Voice Call Progression
- HCO with Privacy
- HCO Branding
- Standardized or personalized HCO call announcement and explanation
- Two-Line HCO
- Reverse Two-Line HCO
- HCO-to-VCO

- HCO to TTY

Except where waived by the FCC, OTRS CapTel users are able to access all types of TRS calls. The requirement to provide 711 dialing is waived for outbound calls made from a CapTel phone. STS and HCO calls are also waived.

§64.604(3)(vi) TRS providers are required to provide the following features: (1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

Call Release Functionality

OTRS's TTY Call Release, also known as TTY-to-TTY call set-up, is fully in compliance with FCC standards. Once the CA has both TTY parties on line, the CA releases the call and the conversation is removed from the CA's screen, ensuring confidentiality. TTY callers are then able to conduct a conversation with their called party (TTY) without an intermediary remaining on the line.

OTRS adheres to the FCC's 2nd Report and Order rule that when a call is signed off or 'released' by the CA, the call ceases to be a relay call and is no longer subject to the per-minute reimbursement. With 2-Line CapTel service, a CapTel user can release or receive captions at any time during a call.

Speed Dialing Functionality

OTRS speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to 30 frequently called telephone numbers in their TRS customer profile. Customers who wish to store more numbers can simply register multiple customer profiles, which translate to an unlimited number of entries. When the customer calls into the center, the customer can simply provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the CA will dial the associated ten-digit telephone number without delay. The frequently dialed number entry can be sorted by name or number. The CapTel Consumer Premises Equipment (CPE, or CapTel phone) is equipped with the ability to program in 3 speed dial numbers, and a recently dialed number.

Three-Way Calling

OTRS provides three-way calling capability, in which the voice or STS relay users through TRS (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center. Relay users who have purchased three-way calling or conference calling capability from his/her Local Exchange Carriers (LECs) can use this feature when placing a call through OTRS. This feature allows the user to place the call to the relay and then conferences in the voice-called party. This is also known as the Two-Line VCO method.

TTY users may also use the relay to conference in another TTY user on the line. The original TTY user requests to place a call to the voice-called party. It then becomes a conversation between

two TTY customers and one voice customer. This process also would apply if there were two voice customers and one TTY user on the line.

OTRS provides three-way calling for CapTel users that is in full compliance with FCC requirements. Two-line CapTel users are able to host, join or be added to any three-way call in the same manner as traditional telephone users. One-line CapTel users are able to join any three-way call in progress. In order to be added, the host of the three-party call would simply dial the national CapTel number and enter the CapTel user's telephone number. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

§64.604(3)(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

OTRS, through Sprint, provides an advanced Phoenix platform which contains CA-generated macros (e.g., pre-programmed phrases) which allow the CA to press a "hot key" to alert TRS users of the presence of a recorded message and/or interactive menu. Sprint's hot key sends text to the user which says "(RECORDING)". Sprint's hot keys are available in all supported languages, including English and Spanish.

OTRS has the ability to electronically capture recorded messages and retain them for the length of the call. All information provided during the call to the CA to assist in processing the call is considered customer-sensitive information and is deleted from the CA's screen, after the call has ended. The only information that is retained is information in the Call Detail Record necessary to bill the call.

OTRS does not impose additional charges for any calls which must be made in order to process calls involving recorded or interactive messages. Sprint's sophisticated Phoenix feature incorporates "function keys" allowing the CA to complete standard tasks with a combination of two-keys (or mouse clicks). As a result, many calls involving recordings can be completed without having to redial using Sprint's recording functionality. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call over an ultra-watts line so the end user is not imposed charges for additional calls.

OTRS CapTel users are able to hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and reading the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety

or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly. This is treated as one call.

§64.604 (a) (3)(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Retrieving Answering Machine and Voice Mail Messages

OTRS has the ability to retrieve messages from any voice processing system that can be accessed via the telephone. Through Sprint's Phoenix platforms, CAs are able to retrieve and relay voice messages for TTY users and TTY messages for voice users.

When a user requests the CA to retrieve messages from a voice mail system or PBX mailbox, the CA adheres to the following process:

- The CA informs the caller that an answering machine has been reached.
- If the caller has provided instructions, such as access codes, the CA follows the user's instructions. Sprint uses the touch-tone capability embedded in Sprint's Phoenix software to enter access codes or system commands to retrieve new messages, play all messages, save messages, and/or delete messages (depending on customer instructions).
- If necessary, OTRS CAs use advanced recording technology to slow down the playback of the messages. If a CA needs to redial to process these calls, the CA can quickly redial, using a specific redial hot key for answering machine, voice mail and recordings which redials the call so the end user is not imposed charges for additional calls. If the CA needs to redial, local calls are free. If the call is long distance, the customer is only charged long-distance calls for the first call.
- Sprint's platform provides the technology necessary to retrieve voice mail or answering machine messages including enabling and disabling touch-tone capability through hot keys (i.e. DTMF).
- Once all customer instructions have been followed and the caller disconnects, all information including caller's personal information is automatically deleted from the CA's position to ensure that the customer's information is kept confidential.

Like TRS users, OTRS CapTel users can retrieve answering machine messages from an answering machine that is near the CapTel phone. However, the CapTel user will need to follow instructions that are slightly different than TRS users including the following:

- Press the CapTel menu button that until the option, "Caption External Answering Machine Messages" is displayed. (Please note that the handset must be hung up to do this.)
- Press the "OK" button.
- Pick up the handset and place it near the answering machine.

- Watch the CapTel display to see when the CapTel CA is connected.
- Press the "play" button on the answering machine.
- View the captions on the CapTel display.
- Save, delete or navigate to the next message using the answering machine controls.
- When done, simply hang up the handset and the phone will be ready for the next call.

With other voicemail systems, the CapTel user can both hear and interact directly with the recorded message and make the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

A.4 Handling of Emergency Calls

§64.604(a)(4) Emergency call handling requirements for TTY-based TRS providers. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

OTRS accepts incoming emergency calls, and automatically and immediately transfers a call to an appropriate Public Safety Answering Point (PSAP). Through Sprint, OTRS has access to the following:

- The largest footprint of coverage across the U.S. to terminate a 9-1-1 call.
- A web interface with complete API and a branded end-user portal for address changes for internet calls.

Call Processing Procedures

OTRS uses the following procedures to ensure that TRS users needing emergency services receive prompt assistance with their call.

1.	OTRS CAs act upon the word "emergency". Calls placed to fire, police, ambulance and rescue squad are considered emergency calls.
2.	The CA hits a Phoenix function or hot key which designates the call as an emergency. This key also prompts the system to use the caller's NPA/NXX to automatically route the call to the E-911 center which is closest to the caller's rate center. This hot-key also "freezes" the screen with an emergency banner so that the call information remains displayed. If the customer hangs up, the caller's information is available to be shared with the 911 center.
3.	Simultaneously, the CA presses a key to notify the supervisor. The supervisor will assist the CA in processing the call, if needed. The supervisor does not take over the CA function unless requested or necessary to complete the call.
4.	The caller's Automatic Number Identification (i.e., telephone number) is passed to the E-

	911 as Caller ID.
5.	The CA identifies the call to the authorities, using the phrase: "This is an emergency. I am calling for a deaf (or hard of hearing or Speech Disabled) person through the Oregon Relay Service. They are calling from (caller's telephone number). This is CA #1234, one moment please."
6.	The CA advises the inbound caller that the emergency services is on the line. For example, "(POLICE ON LINE NOW)" and then types the way the 911 operator answered the phone.
7.	The CA relays the call. Unlike other relay calls, CAs may step outside of their neutral role to more actively facilitate communication, as needed.
8.	Upon request, the CA connects the TTY caller directly to a Public Safety Answering Point (PSAP) that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.
9.	The CA fills out an "Emergency Incident Form" which documents the call.
10.	In the rare case of an E911 routing error, the CA will fill out a technical "trouble ticket" for additional investigation.

Back up Procedures

Through Sprint, OTRS has access to an upgraded PSAP solution that has proven extremely accurate, resulting in few instances of PSAP routing errors. In many instances, two numbers are provided for each rate center. If one of the numbers fails, the second number is dialed. In the event that a valid number is not available, the CA will contact Directory Assistance for support.

CapTel Emergency Calling

When calling 911 using a one-line CapTel phone, the call is processed in the same way as a 911 call processed when using a standard telephone as follows:

- The CapTel phone automatically converts to a VCO phone and dials 911 directly. (The CapTel Call Center is not engaged in processing 911 calls.)
- The CapTel phone displays the typed responses from the PSAP and the caller uses their voice to communicate with the PSAP.
- The user is connected to the proper 911 Center in the least amount of time and the telephone number (ANI) is automatically routed to the 911 Center.
- The 911 system renders the appropriate emergency response.

Two-Line CapTel Emergency Calling

Because Two-Line CapTel uses separate voice and data connections, it offers the most efficient way to access Emergency Services via 911 response Centers. The Two-Line CapTel user is connected directly to 911 on a standard voice connection. The captions are connected on the second line. This procedure means that the call is connected in the fastest time, to the most appropriate 911 Center every time, with a reliable voice grade connection and with full speed captions.

Training and Support Materials

OTRS CAs and supervisors receive in-depth training on all emergency processes and procedures. This training is reinforced through on-going refresher training where Call Center staff must demonstrate knowledge and proficiency of emergency processes and procedures.

Supervisors or Operations personnel are available 24/7/365 to assist CAs when an emergency call occurs. CAs also have immediate access to call processing steps via an online help screen and position reference guide.

Variations

There are many things that can happen during an emergency call, which require immediate action outside traditional call processing. The following processes were established for many of these "variations" to guide CAs and the Call Center staff on how to proceed:

Caller Disconnects Before Connecting to 911 Center

If the inbound caller disconnects prior to being connected to 911, the Phoenix system will continue dialing to the PSAP/emergency call center. The CA or supervisor notifies the PSAP Call Center of the premature disconnect and provides any customer information that may assist the PSAP center in resolving the emergency.

If a customer calls into the TRS center, types "HELP GA" and hangs up, we will treat this as an Emergency call. Since the customer does not give an emergency service name, OTRS connects the caller to the police. The CA notifies the supervisor who, in turn, calls the police and passes on all known information about the call. The CA also completes an Emergency Incident Form as a record. The police make the determination as to what kind of emergency it is and dispatch the required emergency service.

Voice Emergency Calls

If a voice customer misdials 711 when actually they require assistance through 911, the CA says to the inbound caller: ***"You have connected to a telephone relay service for the deaf and hard-of-hearing. If possible, you should hang up and dial 911. If not, we can attempt to connect you to a 911 center near your assigned telephone number, but there could be significant delay in getting assistance."***

When the voice caller does not disconnect, requests further assistance, and/or remains online for more than 5 seconds after the notification phrase is read, the CA will attempt to complete the call to connect the caller to emergency services. The CA will inform the caller, "I am connecting your call to Emergency Services, one moment please."

A.5 STS Called Numbers

§64.604 (a)(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

OTRS offers the ability for STS users to maintain a record of regularly called names and telephone numbers. OTRS' speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to 30 frequently called telephone numbers in their Customer Profile. This information, along with other preferences described below, will be transferred to any new STS provider.

When the STS user calls into the center, the user provides the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, when a caller requests, "Please call mom," the STS CA repeats the name and states the telephone number before dialing the associated ten-digit telephone number without delay.

§64.604 (6) Visual privacy screens/idle calls. A VRS CA may not enable a visual privacy screen or similar feature during a VRS call. A VRS CA must disconnect a VRS call if the caller or the called party to a VRS call enables a privacy screen or similar feature for more than five minutes or is otherwise unresponsive or unengaged for more than five minutes, unless the call is a 9–1–1 emergency call or the caller or called party is legitimately placed on hold and is present and waiting for active communications to commence. Prior to disconnecting the call, the CA must announce to both parties the intent to terminate the call and may reverse the decision to disconnect if one of the parties indicates continued engagement with the call.

The PUC does not provide, contract to provide, or oversee VRS services and is exempt from this section.

§64.604 (7) International calls. VRS calls that originate from an international IP address will not be compensated, with the exception of calls made by a U.S. resident who has pre-registered with his or her default provider prior to leaving the country, during specified periods of time while on travel and from specified regions of travel, for which there is an accurate means of verifying the identity and location of such callers. For purposes of this section, an international IP address is defined as one that indicates that the individual initiating the call is located outside the United States.

The PUC does not provide, contract to provide, or oversee VRS services and is exempt from this section.

Technical Standards

B.1 ASCII and Baudot

§64.604 (b) Technical standards—(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

The PUC contracts with Sprint to provide Baudot (45.5 and 50), Turbocode, Enhanced Turbocode (E-Turbo) and all ASCII rates generally in use.

Upon a call being received at the CA position, TTY signals are automatically identified as Baudot, Turbocode or ASCII; if ASCII, the Baud rate is detected.

Outbound calls are dialed out in voice mode so that both the CA and hearing user (if applicable) can hear the progress of the call. If the phone is answered by a modem, the software automatically switches to the appropriate mode of Baudot or ASCII based on the tone heard without intervention from the CA. If the call is answered by a voice person, the CA requests the text device if a voice user originated the call.

B.2 Speed of Answer

§64.604 (2) Speed of answer. (i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

The PUC contracts with Sprint, who currently has ten (10) TRS and CapTel centers across the U.S. Having access to this number of centers ensures adequate staffing for TRS and CapTel calls. Sprint samples the average answer time a minimum of every 15 minutes for each 24-hour period. Their Traffic Management Control Center (TMCC) is staffed with workforce analysts who understand call processes, call volumes, distribution patterns, contract requirements and call routing, thus ensuring exemplary service.

Sprint's Workforce Analysts develop staffing requirements for each center monthly, daily and in 15-minute increments. These center staffing lines are a management tool, which provides Workforce Analysts and each center with the following:

- Initial CA requirement for each 15-minute period of the day
- Total number of CAs scheduled for each-15 minute period
- The number of CAs over or under the requirement needed to meet forecast call volumes
- Daily, weekly, and monthly performance reports detailing speed-of-answer for each CA group and the CA utilization (occupancy) percentage. These reports are reviewed to ensure that Sprint is routing calls as efficiently as possible while meeting or exceeding customer expectations.
- Adjustments to the minimum staffing requirements can be made as needed to the 15-minute scheduling requirements based on unforeseen increases or decreases in call volumes.

§64.604 (b) (2) ((ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

A requirement of the OTRS contract with Sprint is that 85% of all calls be placed within 10 seconds. "Speed of answer" identifies the number of seconds required to answer a call. OTRS'

CapTel speed of answer meets or exceeds the FCC's requirement to answer 85% of all calls within ten (10) seconds.

The PUC expects that Sprint will continue to review TRS and CapTel data to determine trends, taking into account any call affecting issues such as weather, holidays or technical problems. Utilizing this information, Sprint develops a network forecast for each upcoming scheduling week.

Sprint also reviews each center's results for the previous six-weeks, as well as anticipated changes in staffing levels to determine each center's capacity to handle forecasted calls. Once the forecast has been determined, Sprint ensures that total network traffic is accounted for by each of the centers.

By continually monitoring current capacity with regards to trunking, CA workstations, staffing and equipment lag time between anticipated need and actual need will be minimized.

§64.604 (b) (ii) (A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

The PUC considers the call delivered when the TRS center's equipment accepts the call from the LEC, and the public switched network delivers the call to the TRS center.

Sprint furnishes the necessary telecommunications equipment, facilities, and system software for the complete TRS operation. Sprint is a certified Interexchange Carrier (IXC) in all 50 states. Sprint's transmission circuits meet, and in most cases, exceed the ANSI T1.506-1990 Network Performance – Transmission Specifications for Switched Exchange Access Network standards.

§64.604 (b) (ii) (B) Abandoned calls shall be included in the speed-of-answer calculation.

Pursuant to its contract with Sprint, OTRS includes abandoned calls in its daily speed-of-answer performance calculations.

§64.604 (b) (ii) (C) A TRS provider's compliance with this rule shall be measured on a daily basis.

Sprint measures its compliance with average speed-of-answer times on a daily basis and reports this information to the PUC on a monthly basis.

§64.604 (b) (ii) (D) The system shall be designed to a P.01 standard.

The PUC, through its TRS contract with Sprint, ensures that all relay call centers are provided with sufficient facilities and staffing to provide a Grade of Service (GOS) of P.01 or better for calls entering the call center switch equipment during the busiest hour. Sprint's Relay system ensures that an excess of 99.99 percent of all calls reach the call center and are answered or receive a ringing signal.

§64.604 (b) (ii) (E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

Performance of inbound traffic on each OTRS relay toll-free number where it enters the Sprint network or relay center facility is measured continuously and reported both daily and monthly. These measurements, which include traffic volume and blockage data, are compiled into a monthly report available to the state.

§64.604 (b) (iii) Speed of answer requirements for VRS providers are phased-in as follows: by January 1, 2006, VRS providers must answer 80% of all calls within 180 seconds, measured on a monthly basis; by July 1, 2006, VRS providers must answer 80% of all calls within 150 seconds, measured on a monthly basis; and by January 1, 2007, VRS providers must answer 80% of all calls within 120 seconds, measured on a monthly basis. Abandoned calls shall be included in the VRS speed of answer calculation.

The PUC does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.3 Equal Access to Interexchange Carriers

§64.604 (b) (3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

OTRS and CapTel users have equal access to their chosen interexchange carrier through relay to the same extent access is provided to voice users.

OTRS and CapTel users are encouraged to register their preferred Carrier-of-Choice (COC) with Customer Service. Users who have not registered their preferred COC are encouraged to contact Customer Service to complete their registration. All new CapTel devices come with a COC card packaged with the equipment. Users are responsible for filling out the card or contacting CapTel Customer Service to receive the benefits of registering their COC preferences for CapTel calls.

Voice-in users calling CapTel users are also notified that their call may incur long distance charges. After connecting to the CapTel voice-in Voice Response Unit (VRU) and entering the phone number of the CapTel user they wish to call, they may receive a verbal announcement stating that their call may include long distance charges.

OTRS relies on Sprint to provide its relay customers with both the technical and operational capability to send and receive COC calls to and from other providers. Sprint's network has the capability to permit users to select the IXC or LEC of their choice in accordance with state and federal law.

Sprint provides the necessary network connections and signaling information in compliance with the standards accepted by the Alliance for Telecommunications Industry Solutions (ATIS) titled "ATIS-0300084, Telecommunications Relay Service" (July 2006) for carriers to accurately bill and rate relay calls. Sprint routes calls to the designated carrier in as efficient a manner as possible.

Sprint includes the identification of the call as a relay call, the end user calling number, the called number, and additional information describing the nature of the calling line (e.g., payphone, etc.) Calls not requiring operator assistance are routed to the carrier's non-operator switch. Calls involving alternate billing (e.g., card, collect, third party) involve the operator services position of the carrier. Again, Sprint provides as much information as possible to the operator services position of the transport carrier through network signaling. Efficient provision of routing to the carrier minimizes the call set-up time associated with the relay call.

Sprint encourages all carriers to participate in its COC program. When the requested carrier is not a COC participant, Sprint has established a procedure where the carrier is notified, verbally and in writing, of its obligation to provide access to relay users and encourage their participation.

Outlined below is the process used by CAs to process COC calls and subsequent instructions to relay callers:

- OTRS CA answers the call.
- The caller provides the toll-call information.
- The caller provides preferred carrier information either registered in the user database or for a specific call.
- If the preferred carrier is not available through the OTRS, the CA informs the caller with the standard phrase:

"I AM SORRY (carrier) DOES NOT ALLOW (billing method) CALLS OVER THEIR NETWORK."

- The user may choose to have another carrier handle the call. Sprint Relay then informs the unavailable carrier of its obligation to provide access through the relay service.
- The CA outdials the call utilizing the preferred carrier. If no carrier is specified, the call will be carried over the Sprint network.
- The called-party answers the call. The CA relays the COC call between the caller and the called-party.

Sprint currently has 240 carriers participating in the Sprint Relay's TRS COC program. Participation of carriers in Oregon is dependent on whether carrier is authorized to provide service in Oregon and connectivity to the Sprint Access Tandem. Currently the list of providers in the state includes:

Carrier Name	Out COC	COC Index	Carrier Code	Operator Flag	ETurbo RIB
10-10-220 Telecom USA	0220	0220	0220	N	220
10-10-321 Telecom USA	0321	0321	0321	N	321
10-10-502 WorldxChange	0502	0502	0502	Y	502
10-10-636 Clear Choice	0636	0636	0636	Y	636
10-10-752 EXCEL	0752	EXL1	0752	Y	752
10-10-811 Vartec	0811	0811	0811	Y	811
10-10-834 WorldxChange	0834	0834	0834	Y	834
10-10-987	0987	0987	0987	N	987
AT&T	0288	0288	0288	Y	ATT
All Others	0001	0001	0001	N	
Broadwing	0948	0948	0948	Y	SSM

Communications					
Broadwing Telecom	0071	0071	0071	Y	WSN
CP Telecom	0444	ALN9	0444	Y	PDF
Call & Effect Long Distance	0638	NWT1	0638		
Cascade Long Distance	0638	NWT5	0638		
CenturyLink	0550	CTL1	0550	Y	CTL
CenturyTel Long Distance	0550	CAL1	0550	Y	CAL
CenturyTel Solutions	0550	CAL2	0550	Y	CAL
Charter Communications	6324	6324	6324	Y	HFB
Citizens Communications	0001	0096	0096	Y	
Columbia Long Distance	0638	NWT6	0638		
Comcast	0386	0386	0386	Y	BPH
Frontier Communications	0096	FLX1	0096	Y	RTC
Global Crossing	0444	0444	0444	Y	ALN
LDDS	0222	MCI2	0222	Y	LDD
MCIWorldCom	0222	0222	0222	Y	MCI
McLeod USA	0725	0725	0725	Y	IOR
Metromedia	0222	MCI3	0222	Y	MTR
NSC Telesystems	0555	WT17	0555	Y	NSC
OPEX LD	0444	ALN1	0444	Y	OPX
Penny Express	0465	INL1	0465		
Prime Dime Long Distance	0465	INL2	0465		
QWest	0432	0432	0432	Y	QWD
SBC Long Distance	5792	5792	5792	Y	SBZ
Simcom	0444	ALN2	0444	Y	SMC
Sprint	0333	0333	0333	Y	SPT
TCG Minnesota Inc.	0292	0292	0292	Y	TPM
TDS Telecom	0417	0417	0417	Y	TYW
Telephone Express	0899	0899	0899		
Touch America	0244	0244	0244	Y	AUD
Verizon LD	5483	5483	5483	Y	GOP
Wiltel	0222	MCI1	0222	Y	WLT
Working Assets	0649	0649	0649	Y	WRK
WorldCom	0555	0555	0555	Y	WTL

Please see **Appendix D** for a copy of the COC invitational letter sent to carriers.

B.4 TRS Facilities

§64.604 (b)(4) TRS facilities. (i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

OTRS, through Sprint Relay Customer Service, are both available 24 hours a day, every day of the year for all TRS services. OTRS, through Sprint, utilizes both Uninterruptible Power Supply (UPS) and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel

to maintain operations for at least 24 hours. CapTel Relay Services are also available 24 hours a day, seven days a week.

§64.604 (b)(4) (ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

The PUC contracts with Sprint whose relay centers are equipped with an UPS generator and sufficient fuel to provide power for 24-hours following a power failure. These back-up power systems can continue to provide power beyond 24-hours as long as fuel is readily available.

Working in parallel with the UPS is Sprint's Intelligent Call Router, which instantly recognizes a problem anywhere in the Sprint relay system and routes the calls to other operating call centers. OTRS customers will be unaware of any system fault.

In the event of a power outage, the UPS provides seamless power transition while the emergency generator is brought on line. During this transition of less than a minute, power to all the basic equipment and facilities for the center operation is maintained. This includes the switch system and its peripherals, switch room environment (air conditioning and heating in the computer room), CA positions (including consoles/terminals), emergency lighting, system alarms and Call Detail Record (CDR) recording. As a safety precaution, the fire suppression system is not electrically powered in case of a fire during a power failure. Once the back-up generator is on line, stable power to all relay system equipment and facility environmental control is established and maintained until commercial power is restored.

All of the system preventative maintenance functions can be performed on-line, with no effect on call processing. In addition, on-line and off-line diagnostic routines will identify system faults or failures to the individual board level. Diagnostic procedures are continually processed by the switching system software to detect defective components before they are used. Manual on-line diagnostics can be launched at any time from the maintenance and administrative terminal located with the unit without affecting call processing, calls in progress or calls waiting to be answered. The maintenance and administrative terminal includes keyboard, screen and printer capabilities.

Please see Sprint's Disaster Recovery Plan and the Network Support Plan in **Appendix E**.

§64.604 (b)(4)(iii) A VRS CA may not relay calls from a location primarily used as his or her home.

The PUC does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

§64.604 (b)(4)(iv) A VRS provider leasing or licensing an automatic call distribution (ACD) platform must have a written lease or license agreement. Such lease or license agreement may not include any revenue sharing agreement or compensation based upon minutes of use. In addition, if any such lease is between two eligible VRS providers, the lessee or licensee must locate the ACD platform on its own premises and must utilize its own employees to manage the ACD platform.

The PUC does not oversee VRS services, does not contract with a VRS provider to provide VRS services to customers, and is exempt from this section.

B.5 Technology

§64.604 (b)(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

OTRS through Sprint, is in full compliance with 47 CFR §64.1600 et seq. of the FCC's Rules for providing SS7 capability.

In order to achieve functional equivalence, OTRS continues to provide Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long-distance calls. OTRS receives calling party identifying information including blocking information, from all relay users. Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound relay caller as well as other SS7 call information elements such as:

- Calling Party Number
- Charge Number
- Originating Line Information
- Sprint passes through the calling party information (rather than 711 or the number of the Relay Center)

State-of-the-Art Technology

As the provider of relay services for the state of Oregon, Sprint offers several enhanced features to improve the telecommunications access of STS relay users. These advanced features include:

- Message Retention (up to 24 hours)
- STS Called Numbers
- Privacy Option
- STS Contact Information
- STS Email Call Set-up
- STS with Voice Carry Over
- Specialized STS Customer Service (including Training Line)
- Wireless Access - STS (*787)

Wireless Access – STS (*787)

Sprint launched the first wireless short-code solution for STS users. Beginning in early 2012, Sprint wireless customers were able to dial *STS (i.e., *787) to reach a STS CA quickly and easily from anywhere in the nation. All callers who are physically located within the state are

automatically connected to a STS CA. This service is available to both callers with and without a speech disability, who need to place a STS call. Voice callers needing to place a call to a STS user may also use this service.

When OTRS customers travel outside of the state, callers are connected to STS based on their physical location. If they are in a state where Sprint is the relay provider, the caller is connected to that state's STS service. If not, callers are automatically transferred to Sprint's interstate STS service, where they will be able to place interstate calls only. This new enhancement grants additional mobility and flexibility for STS users.

STS Message Retention

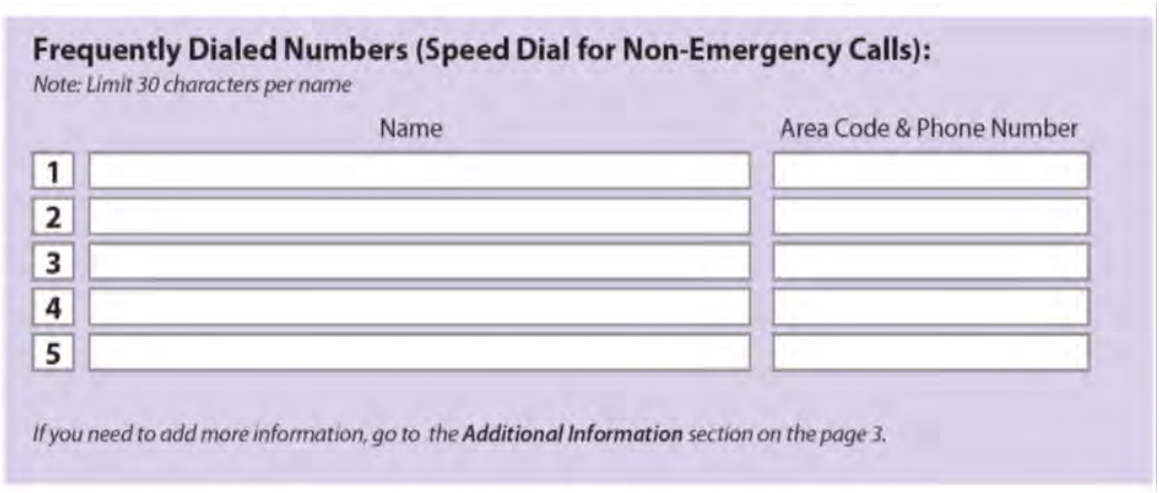
In addition, Sprint has expanded its Customer Profile to allow STS users to retain messages for up to 24 hours. The STS user may dictate the first message to be read to the called party. This feature allows the STS user to request that this initial message be retained in the relay system for up to 24 hours. This is especially helpful if the STS user needs to leave a message and the line is busy. If the called party is unavailable (e.g. busy signal, no answer), the STS user may request that the STS message be retained. Over the next 24 hours, the STS user can redial their state STS' number and request that the call be re-attempted. At the end of 24 hours, the message is automatically deleted from the Customer's Profile.

STS Called Numbers

Sprint will continue to offer the ability for STS users to maintain a record of regularly called names and telephone numbers. Sprint's speed dialing functionality (also known as frequently dialed numbers) allows relay users to store up to 30 frequently called telephone numbers in their Customer Profile.

When the STS user calls into OTRS, they can provide the CA the "short-hand" name or code associated with that number instead of the entire 10-digit number. For example, a caller can simply request, "Please call mom," and the STS CA will dial the associated ten-digit telephone number without delay.

Please see the graphic below for the written Customer Profile form, which encourages STS users to register speed dial entries.



Frequently Dialed Numbers (Speed Dial for Non-Emergency Calls):

Note: Limit 30 characters per name

	Name	Area Code & Phone Number
1		
2		
3		
4		
5		

*If you need to add more information, go to the **Additional Information** section on the page 3.*

STS with Privacy Option

OTRS offers STS users the ability to communicate without the CA hearing the voice party. If this option is selected, the CA simply listens to the voice of the STS user and repeats messages according to the STS users' preference.

STS Contact Information

Voicing out telephone numbers may be difficult for some STS users. This STS Contact Information feature allows STS users to advise friends, family and others to dial 7-1-1 to reach them. Once connected, the person can provide the STS user's name to the STS CA. The STS CA will use the STS user's profile information provided for this purpose to connect to the STS user based on the registered STS user's hours and days of availability. In this manner, the inbound caller can be connected with the STS user at their location.

Emergency Numbers

In most emergency situations, STS callers dial 9-1-1 first for emergency help. However, STS users also have the ability to list up to ten additional emergency phone numbers in their Customer Profile. Contacts such as a doctor's office, the local/state poison control center and the local hospital are used for this purpose.

B.6 Caller ID

§64.604 (b) (6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

The PUC, through its OTRS contract with Sprint, provides true Caller ID service through SS7 signaling where the 10-digit number of the calling party is passed through to the called-party for local and long distance calls. Sprint receives calling party identifying information including blocking information, from all TRS users.

Customer Control
With Sprint's Caller ID, the OTRS user is in control. OTRS users with this feature are able to disable or block their Caller ID information from being transmitted with their LEC on either a 'per-call' or a 'per-line' basis.

The OTRS user can view the calling party's information before picking up the phone before deciding whether or not to answer the call based on the name and number displayed on the Caller ID unit or their telephone display screen.

With Sprint's Caller ID, there are numerous benefits for OTRS users, including:

- Increased privacy
- Documentation of calls received
- A count of incoming calls on the display screen
- Phone numbers of hang-up callers
- Prompt emergency call processing

When Caller ID information is not passed through, as with standard telecommunications, the call recipient will receive a message such as "Out of Area" or "Caller Unknown."

Technology
OTRS offers True Caller ID for all local and long-distance calls to carriers who have SS7 connectivity with Sprint. Sprint's SS7 network interfaces with all national long-distance carriers and major LECs, CLECs, and ILECs.

Sprint's Caller ID SS7 solution includes receiving the privacy bit information from the inbound relay caller as well as other SS7 call information elements such as: the Calling Party Number, Charge Number and Originating Line Information. Sprint passes through the calling party information (rather than 711 or the number of the TRS Center).

Caller ID Enhancements
Many Caller ID enhancements are compatible with the relay service and can be accessed by OTRS users.

Selective Call Acceptance
Selective Call Acceptance allows an OTRS user to create a list of phone numbers so that they receive only calls from numbers on that list. All other callers will be directed to an announcement that says "The number you have dialed is not accepting calls at this time." If this recording is reached by OTRS, it will be typed or spoken to the inbound caller. When Selective Call Acceptance is in effect, it supersedes all other enhanced features.

Selective Call Rejection
Selective Call Rejection enables the OTRS user to create a list of special phone numbers so that when a call is received from that number, the call will be rejected. If this recording is reached by OTRS, it will be typed or spoken to the inbound caller.

Selective Call Forward
Selective Call Forward enables the OTRS user to create a list of special phone numbers so that when a call is received from someone on that list, the call will be forwarded to a designated number.

Privacy ID (Anonymous Call Rejection)
Privacy ID, also known as Anonymous Call Rejection, allows OTRS users to restrict incoming calls from parties who have blocked their Caller ID information. If the name or number of the person that calls you is unknown, the caller hears a recorded message, such as:

"The person you are calling does not accept blocked or unknown calls. At the tone, please say your name or company name and your call will be connected."

This information will be typed or voiced to the originating caller. If the calling party wishes to leave their name, it will be left by the CA. The called party, if hearing, may listen to the recording and choose an option to answer, block or send to voice mail. Realizing that not all users will be able to hear this recording by the calling party, some companies have implemented additional enhancements outlined below:

Instant Access List (Preferred Caller List)
OTRS users may designate a list of up to 10 numbers that can bypass the Sprint Privacy ID function. If a caller's number displays while their name doesn't, adding their number to this list will let their calls through.

Caller's Access Code
Caller's Access Code allows a user to designate an override code for Privacy ID. The user may share this code with friends and family, as desired. When the calling party calls, they may choose to enter a code during the intercept greeting to bypass the Privacy ID screening so their call will go through. This works great for friends and family who frequently call from areas where Caller ID is not available.

Functional Standards

C.1 Consumer Complaint Logs

§64.604 (c)(1)(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution. (ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

OTRS has established policies regarding complaints, inquiries, comments and commendations related to relay services and personnel. Upon receipt of a direct complaint filed by a customer, a

designated representative will accept the complaint, provide the customer with information regarding the process for resolution and will offer to follow-up with the customer. Sprint ensures that all records will include the name and/or address of the complainant (when offered), the date received, the CA identification number, the nature of the complaint, and the result of any investigation and the date of resolution.

OTRS works closely with Sprint to identify contact particulars such as: consumer type (TTY, VCO, HCO, Voice or STS), customer contact information (when given), CA identification numbers, the call handling center and over forty-five contact categories including: complaints, inquires and unsolicited commendations.

Sprint submits reports detailing the information above. Each report will include the following information:

- Name of the complainant or commendation
- The date of the contact, complaint or compliment
- The nature of the complaint or comment
- The action taken (i.e., technical support, service explanation, CA development area, preparation of commendation)

All contacts and complaints received by Customer Service, Supervisors, and Account Management are documented in Sprint's customer contact database.

Customer Contacts Online Database (CCOD)
To further support the complaint resolution process, Sprint has developed a Customer Contact Online Database (CCOD), which serves as a seamless and timesaving device for documenting customer contacts.

The CCOD will automatically notify the TRS Sprint program manager assigned to the state of Oregon via email of any complaint entry, ensuring that they receive timely notification of consumer concerns. The CCOD will track consumer contact information as required by the FCC.

By approximately June 15th of each calendar year, Sprint submits a copy of 12-month complaint log report for the period of June 1- May 31 to the Oregon administrator to review the log and file to the FCC by July 1st of each year.

See **Appendix G** for copies of the last five years of OTRS' complaints that have been submitted to the FCC.

C.2 Contact Persons

§64.604 (c)(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following: (i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and (iii) The physical address to which correspondence should be sent.

OTRS callers may file intrastate complaints and commendations regarding OTRS services through the following contacts:

Jon Cray, RSPF Manager
Oregon Public Utility Commission
P.O. Box 2148
550 Capitol Street NE, STE 215
Salem, Oregon 97308-2148
503-373-1413 (TTY)
800-648-3458 (TTY toll-free in-state only)
503-373-1400 (Voice)
800-848-4442 (Voice toll-free in-state only)
503-378-6047 (Fax)
jon.cray@state.or.us (E-mail)
www.puc.state.or.us

John Moore, Interim OTRS Relay Program Manager
333 Inverness Drive S
Englewood, CO 80112
303-721-4090 (Voice)
john.e.moore@sprint.com (E-mail)

C.3 Public Access to Information

§64.604 (3) Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

The PUC provides a comprehensive outreach program for all OTRS services. Each year, approximately $150,000 is designated towards ensuring that specific populations are given information regarding the OTRS programs. The OTRS Relay Program Manager and the PUC state relay administrator determine how funds are allocated to effectively educate the Oregon public. The PUC also receives input on these outreach endeavors from the legislatively mandated 12 member Telecommunication Devices Access Program Advisory Committee, made up of deaf, hard of hearing, mobility, speech disabled community members, as well as professionals from hearing

and speech-related fields and telecommunication industry representatives. Currently, these advisory board members include:

Stephen Sanders, Chair
Professional Representative
Portland
June 2008-June 2012

Cathy-Lynne Bovee, Vice Chair
Hard of Hearing Representative
Myrtle Creek
September 2011 – September 2013

Phil Boyle
Public Utility Commission
Salem
No term expiration

Jim Nieuwstraten
Hard of Hearing Representative
Scio
December 2011 – December 2013

Michael Rodeen
Hard of Hearing Representative
Eugene
March 2012 – September 2013

Evan Steffeck
Speech Representative
Portland
March 2012 – September 2013

Brant Wolf
Oregon Telecommunications Association, Industry Representative
Salem
No term expiration

The PUC has an additional advisory group mandated by PUC Order—the OTRS Industry Advisory Group, which is represented by key members of the telecommunication industry. See **Appendix H** for this mandate.

The PUC collaborates with the telecommunications industry to ensure that the public is informed about the availability of OTRS. Please see **Appendix I** for a copy of an advertisement in a telephone directory for OTRS. In addition, information about OTRS was placed in the TDI Blue Book, a national telecommunications directory for deaf and hard of hearing individuals. See **Appendix J**, pages 322-323 for this information.

In the past year, the PUC and OTRS launched a stand-alone, comprehensive website entitled www.oregonrelay.com that includes information about all of the services that are provided by OTRS. For more information about this website, see **Appendix K**, page 11 of the 2012 OTRS annual report. Also included in the annual report is information about the other outreach programs that have been conducted by OTRS. The oregonrelay.com website has drawn in an average of 5,000 visitors per month. To see statistics on the number of visitors and hits to the website, see **Appendix L**.

Over the past five years, some of the more innovative programs that were established by OTRS have continued. These programs include: senior citizen outreach, focusing primarily on CapTel services; Native American Outreach Program (Oregon was the first state under contract by Sprint to launch this program, and other states have followed suit); CapTel PSAs and a dedicated CapTel website under www.oregoncaptel.com and Taste of Technology forums, which focus on educating the public about STS, Spanish relay, 711 and CapTel services. In addition, the oregonrelay.com website showcases the new STS-enhanced services that include information about STS email services (see **Appendix Q**). Included in the appendices are several examples of information that has been disseminated to the public over the past five years. Please see the following:

- Appendix M: Comprehensive OTRS Brochure
- Appendix N: 2010 Taste of Technology Materials
- Appendix O: CapTel Directory Advertisement
- Appendix P: Report on Senior and Native Outreach Activities
- Appendix R: OTRS Advertisement
- Appendix S: OTRS Advertisement
- Appendix T: CapTel Advertisement

C.4 Rates

§64.604 (4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination

OTRS users are not charged more for services than for those charges paid by standard "voice" telephone users. OTRS users, who select Sprint as their interstate carrier, will be rated and invoiced by Sprint. The caller will only be billed for conversation time. Those users, who select a preferred interstate carrier via the OTRS COC list, will be rated and invoiced by the selected interstate carrier.

By FCC jurisdiction, Sprint has two separate Message Telephone Service rates – one for interstate and one for intrastate if the state contract allows. At this time OTRS does not have intrastate discount rates through their contract with Sprint. The table below exhibits the discounted rates off Sprint's Message Telephone System (MTS) rates.

	Interstate
Day (7 AM – 6:59 PM)	50%
Evening (7 PM – 10:59 PM)	50%
Night/weekend (11 PM – 6:59 AM; all day Saturday & Sunday)	50%

C.5 Jurisdictional Separation of Costs

§64.604 (5) Jurisdictional separation of costs—(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended (ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under §64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

All OTRS relay intrastate and interstate minutes are reported separately to the state on the Sprint invoice. The interstate and international minutes are reimbursed by the TRS Interstate Fund (Fund). The local and intrastate minutes are reimbursed by the state of Oregon. On individual customer invoices, Sprint deducts minutes for which the Rolka Loube Saltzer Associates (RLSA), the Interstate Telecommunications Relay Services Fund administrator, reimburses. These deductible minutes are associated with these call types: Interstate, International, Interstate Directory Assistance, Toll Free and 900. In accordance with FCC rules, states only receive a 51% deduction for Toll Free and 900 minutes for which RLSA reimburses. For RSLA reimbursement, Sprint uses a cumulative report of eligible customers to calculate its monthly reimbursement request. An invoice and supporting documents are sent monthly to RSLA for reimbursement.

OTRS was established as one of four telecommunication assistance programs under the Residential Service Protection Fund (RSPF). The premise for establishing OTRS, as well as the Oregon Telephone Assistance Program (OTAP)/Lifeline and Telecommunication Devices Access Program (TDAP) was the belief that all Oregonians had the right to telephone access, regardless of socioeconomic status, disability or any other deterrent to establishing telecommunications access. OTRS was the last RSPF program to be established in 1989, several years before the Americans with Disabilities Act of 1990 mandated that all states provide relay services by 1993.

To fund the RSPF programs, a telephone line subscriber surcharge was levied on all telephones that could access the relay service, including wireless phones. Approximately 40% of the surcharge funds covers OTRS expenditures, and pays for intrastate calls as well as other expenditures not covered under interstate reimbursement requirements established by RLSA. Please see **Appendix U** for a copy of the current Oregon statute pertaining to RSPF programs. The As previously mentioned, the OTRS Industry Advisory Group is made up of telecommunications representatives in Oregon meet with PUC quarterly to review the surcharge projections and OTRS traffic statistics in order to provide input on the appropriate surcharge rate. The current surcharge rate is $.12 per line. A copy of a telephone bill showing the RSPF surcharge is provided under **Appendix V**.

Telecommunications Relay Fund

§64.604 (c)(5)(iii) through §64.604 (c)(iii)((M) does not pertain to State programs. However, the state of* Oregon *contracts with Sprint who contribute and collect interstate funds through RLSA. It is the state of Oregon's understanding that Sprint complies with the appropriate mandates under this section.

§64.604 (c) (7) (N) (1-4) pertain to VRS providers.

The state of Oregon does not provide VRS services, does not contract to provide VRS services and is exempt from this section.

C.6 Complaints

§64.604 (6) (i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of

such state under §64.605 is in effect, the Commission shall refer such complaint to such state expeditiously. (ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

The PUC works with Sprint to establish a complaint resolution procedure to ensure complaints are resolved within 180 days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with CAs.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The Oregon-assigned Relay Program Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the appropriate Relay Program Manager for resolution and follow-up with the customer. Oregon customers also have the option of calling Sprint's 24-hour Customer Service department (1-800-676-3777), the Sprint Relay Program Manager or the PUC to file complaints or commendations.

The PUC has adopted the informal FCC procedure of closing all complaints, complete with a satisfactory resolution, within 180 days of the date the complaint was filed. The PUC submits all complaints from June 1-May 31st to the FCC by the annual July 1st deadline. To see copies of the Complaint Log Summaries from 2008 through 2012, please refer to **Appendix G**.

C.7 Treatment of TRS Customer Info

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

OTRS, through Sprint's Customer Preference Database, includes type of call, billing information, speed dialing, slow typing, carrier of choice, emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes in customers' profiles. At the end of the ensuing contract(s) Sprint transfers all TRS database records to the next incoming relay provider, at least 60 days prior to the last day of service, in a usable format.

Sprint does not use customer information for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Sprint does not sell, distribute, share or reveal in any other way by the relay center or its employees, unless compelled to do so by lawful order.

§64.606 State Certification

3(b)(1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation: (i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604; (ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and (iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

The PUC has provided OTRS to Oregonians since 1989. Legislative mandates, which established rules for the OTRS since 1987 are enclosed as **Appendix U**. Further evidence of OTRS' commitment to follow the FCC minimum mandatory relay requirements can also be found in the mandatory items listed under the most recent contract between the state of Oregon and Sprint. Please refer to **Appendix F** to review the contract.

The PUC does not provide VRS or any web-based or Internet Relay services for the state of Oregon.

OTRS meets or exceeds all minimum mandated relay services required under all FCC rules, including 47 C.F.R §64.604. The PUC does not provide OTRS or features that conflict or circumvent the FCC rules. Presently, the PUC provides several features through Sprint Relay that exceed the minimum mandatory rules, including but not limited to:

- Carrier of Choice—The PUC exceeds this requirement. Through Sprint Relay, the PUC works with carriers to implement them in the COC program, even without a request from an OTRS user.
- Customized Access Numbers—The PUC provides dedicated 800 numbers (VCO, STS, Spanish Relay, ASCII, Voice, and other access numbers as requested) to assist OTRS users who want to access relay services specifically by their call type. The PUC has had this capability since it first contracted with Sprint Relay in 1992.
- Two Line VCO and Reversed Two Line VCO—The PUC provides two line VCO and reversed two line VCO as an enhanced VCO service, allowing consumers to utilize their voice and residual hearing as much as possible, and has provided this service since early 2000.
- E-Turbocode—The PUC contracts with Sprint Relay to provide E-Turbocode. Sprint Relay is the only relay provider that has E-Turbocode as part of its TRS standard features package for state relay contracts. E-Turbocode, which provides faster transmission of the relay conversation for OTRS users, exceeds this requirement.

• Captioned Telephone services (CapTel)—The PUC provides CapTel an enhanced VCO service and therefore exceeds this requirement. The PUC has provided this as a service since 2004.

OTRS was approved for TRS Certification Renewal by the FCC in 2008. For a copy of this letter, please see **Appendix W**.

§64.606(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

There have been no substantive changes to OTRS since the last FCC Recertification renewal period in 2008.

Appendix A:

FCC TRS Public Notice, July 25, 2012

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PUBLIC NOTICE

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: http://www.fcc.gov
TTY: 1-888-835-5322

DA 12-1187
July 25, 2012

CONSUMER AND GOVERNMENTAL AFFAIRS BUREAU REMINDS STATE TELECOMMUNICATIONS RELAY SERVICE PROGRAMS TO SEEK RECERTIFICATION

CG Docket No. 03-123

This Public Notice alerts states and territories that the certifications that they now hold for the provision of telecommunications relay services (TRS) will expire on July 26, 2013.[1] Under the Federal Communications Commission's (Commission's) TRS regulations, each state or territory may file an application for "renewal" of its certification one year prior to expiration, *i.e.*, beginning on July 26, 2012.[2] Although there is no prescribed deadline for filing, we request that renewal applications be filed no later than October 1, 2012, to give the Commission sufficient time to review and rule on the applications prior to the expiration of the existing certifications.

Congress created the TRS program in Title IV of the Americans with Disabilities Act of 1990 (ADA),[3] codified at Section 225 of the Communications Act of 1934, as amended (Act).[4] TRS enables persons with hearing and speech disabilities to access the telephone system to communicate with other individuals.[5] Under the Act, the Commission must ensure the provision of TRS that is functionally equivalent to voice telephone service.[6] The Commission's TRS regulations set forth mandatory minimum standards that TRS providers must follow to meet this functional equivalency mandate.[7]

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[1] As amended by Section 103(a) of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA), TRS is defined as "telephone transmission services that provide the ability for an individual who is deaf, hard of hearing, deaf-blind, or who has a speech disability to engage in communication by wire or radio with one or more individuals, in a manner that is functionally equivalent to the ability of a hearing individual who does not have a speech disability to communicate using voice communication services by wire or radio." Pub. L. No. 111-260, 124 Stat. 2751, *technical amendments*, Pub. L. No. 111-265, 124 Stat. 2795 (Oct. 8, 2010) § 103(a), codified at 47 U.S.C. § 225(a)(3). *See also Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Order on Reconsideration, and Further Notice of Proposed Rulemaking, 19 FCC Rcd 12475, 12479, ¶ 3 n.18 (2004) (describing how a traditional TRS call works).

[2] 47 C.F.R. § 64.606(c)(1). Since 1993, the Commission has granted states certification to operate their own TRS programs in five year increments. The Consumer and Governmental Affairs Bureau, under delegated authority, issued its last round of certification grants in July 2008.

[3] Pub. L. No. 101-336, 104 Stat. 327 (July 26, 1990).

[4] 47 U.S.C. § 225.

[5] 47 U.S.C. § 225(a)(3).

[6] 47 U.S.C. § 225(a)(3).

[7] *See* 47 C.F.R. §64.604.

Under Section 225, states wishing to establish their own TRS programs for the provision of intrastate and interstate TRS over the public switched telephone network may receive Commission certification to do so.[8] All certified state TRS programs are required to provide traditional (TTY-based) TRS, interstate Spanish language traditional TRS, and Speech-to-Speech relay (STS) service.[9] States may also offer captioned telephone relay service (CTS). States seeking renewal of their certification must include information about each of these services in their applications so that the Commission can ensure that the provision of these services is consistent with its rules and that the state is exercising responsibility for oversight of these services.[10]

Specifically, in order to obtain certification, a state must submit documentation to the Commission that describes its relay program and include its procedures and remedies for enforcing any requirements that the program may impose.[11] In addition, a state must establish that its program makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints.[12] The Commission's TRS regulations explain that documentation should be submitted in narrative form, and that the Commission shall give the public notice of such applications.[13]

The state certification process is intended to ensure that TRS is provided in a uniform manner throughout the United States and territories. Applications for certification will be reviewed to determine whether each state TRS program has sufficiently documented that it meets or exceeds all of the applicable operational, technical and functional mandatory minimum standards set forth in section 64.604 of the Commission's rules.[14] If the program exceeds the mandatory minimum standards, the state must establish that the program does not conflict with federal law.[15] In addition, applications will be reviewed to ensure that each state TRS program makes available adequate procedures and remedies for enforcing the requirements of each state's program.[16]

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[8] Although state TRS programs may offer interstate as well as intrastate TRS, only the costs associated with the provision of intrastate TRS are recovered from the state. *See* 47 U.S.C. §225(d)(3). States with certified TRS programs may allow TRS providers operating under their programs to recover such costs by a method consistent with the jurisdictional separation of costs requirements of Section 225. *See id.* Costs associated with the provision of interstate TRS are recovered from subscribers of interstate and Voice over Internet Protocol (VoIP) service, and such providers are reimbursed through the TRS Interstate Fund. *Id.* In October 2011, the Commission adopted rules to implement Section 103(b) of the CVAA, requiring interconnected and non-interconnected VoIP service providers to participate in and contribute to the TRS Fund. *See* CVAA § 715; 47 U.S.C. § 616; *Contributions to the Telecommunications Relay Service Fund*, CG Docket No. 11-47, Report and Order, 26 FCC Rcd 14532 (2011).

[9] *See* 47 C.F.R. § 64.603.

[10] Since 2003, CTS has been a non-mandatory type of TRS that is eligible for compensation from the states for intrastate calls and from the Interstate TRS Fund for interstate or IP-based CTS calls. *Telecommunications Relay Services, and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CC Docket No. 98-67, Declaratory Ruling, 18 FCC Rcd 16121 (2003). If a state does not offer CTS, it need not submit documentation in its certification application pertaining to this service.

[11] 47 U.S.C. § 225(f); 47 C.F.R. § 64.606(a).

[12] 47 C.F.R. § 64.606(b)(1)(ii).

[13] 47 C.F.R. § 64.606(a).

[14] 47 U.S.C. § 225(f)(2)(A). See 47 C.F.R. § 64.604.

[15] *See* 47 C.F.R. § 64.606(b)(1)(iii).

[16] 47 U.S.C. § 225(f)(2)(B).

PROCEDURES FOR FILING: All filings must reference CG Docket No. 03-123 and be captioned "TRS State Certification Application."

Electronic Filers: Filings may be filed electronically using the Internet by accessing the Commission's electronic comment filing system (ECFS): http://apps.fcc.gov/ecfs//. Follow the instructions provided on the website for submitting electronic filings. For ECFS filers, in completing the transmittal screen, filers should include their full name, U.S. Postal service mailing address, and **CG Docket No. 03-123**.

Paper Filers: Parties who choose to submit by paper must submit an original and one copy of each filing. To expedite the processing of the applications, parties submitting by paper are encouraged to submit an additional copy to Attn: Dana Wilson, Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, SW, Room 3-C418, Washington, DC 20554 or by email at Dana.Wilson@fcc.gov. Parties should also submit electronic disk copies of their certification filing. The electronic media should be submitted in "read-only" mode and must be clearly labeled with the state's name, the filing date and captioned "TRS Certification Application."

Filings can be sent by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission. All hand-delivered or messenger-delivered paper filing for the Commission's Secretary must be delivered to FCC Headquarters at 445 12th Street, SW, Room TW-A325, Washington, DC 20554. The filings hours are 8:00 a.m. to 7:00 p.m. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes must be disposed of *before* entering the building.

Commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9300 East Hampton Drive, Capitol Heights, MD 20743. U.S. Postal Service first-class mail, Express Mail, and Priority Mail must be addressed to 445 12th Street, SW, Washington, DC 20554.

SUMMARY OF STATE TRS PROGRAM CERTIFICATION TIMELINE

DATE	ITEM	FCC ACTION
Beginning July 2012	Commission issues Public Notices seeking comment on state TRS applications that have been filed.	Comments are due within 30 days of release of the Public Notices; reply comments are due within 15 days thereafter.
July 2012 – May 2013	Commission reviews applications for TRS recertification for compliance with 47 C.F.R. §§ 64.604 and 64.606.	If necessary, Commission sends deficiency letters requesting additional information from states to confirm compliance with the TRS mandatory minimum standards and other certification requirements.
May - July 2013		Commission issues Public Notices and Letter Orders of certification renewals.

ADDITIONAL INFORMATION

A copy of this *Public Notice* and related documents are available for public inspection and copying during regular business hours at the FCC Reference Information Center, Portals II, 445 12th Street, SW, Room CY-A257, Washington, DC 20554. These documents also may be purchased from the Commission's duplicating contractor, Best Copy and Printing, Inc. (BCPI), Portals II, 445 12th Street, SW, Room CY-B402, Washington, DC 20554. Customers may contact BCPI at their web site: www.bcpiweb.com or by calling (202) 488-5300. Filings also may be found by searching on the Commission's Electronic Comment Filing System (ECFS) at http://apps.fcc.gov/ecfs// (insert CG Docket No. 03-123 into the Proceeding block).

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY). This *Public Notice* also can be downloaded in Word or Portable Document Format (PDF) at: http://transition.fcc.gov/cgb/dro/trs.html.

For further information regarding this *Public Notice*, please contact Dana Wilson, Consumer and Governmental Affairs Bureau, Disability Rights Office, at (202) 418-2247 (voice), (202) 418-2297 (TTY), or e-mail at Dana.Wilson@fcc.gov**.**

Appendix B:

Sprint TRS, STS, CapTel Training Outlines

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Appendix B: Sprint Training of CAs

TRS TRAINING SCHEDULE		
DAY 1	Welcome Packet/Important Numbers/Confidentiality Forms Building Tour, Lockers, Keycard check, Login Numbers Training Goals and Expectations What is Relay? Video: Making the Right Connection How We Got Here – Orientation - Why we're here. Contract Information Introduction of Training Workbooks TTY Overview/Abbreviations, Descriptive Words/Background Noises	ASL Introduction – ASL Workbooks Overview of System and Equipment Skills i.e. Typing, talking, listening, reading Enter Tour Preferences: Admin Presentation Connecting to Relay Headset Orientation Basic Call Processing Procedures (TTY - Voice) Observe Calls *Typing Practice/Tests if necessary
DAY 2	(TTY – Voice) – continued Role Play Introduction Review (TTY - Voice) TTY - VOICE PRACTICE Phone Image/Rudeness Detachment Expressive Typing Variations Deaf Culture: Quiz about Deafness	Observe Calls Continue Call Processing (Voice - TTY) Administer Spelling Test VOICE - TTY PRACTICE HR – Orientation presentation Review for Test #1 *Typing Practice/Tests if necessary
DAY 3	Review – Variations Branding Recording Feature Answering Machines/Answering Machine Retrieval (AMR) Control D Feature/ Pagers Voice Mail	Pagers/Beepers Deaf Culture: Deaf Timeline Practice Role Plays Observe Administer Test #1 *Typing Practice/Tests if necessary
DAY 4	VCO - Non-Branded VCO - Branded Practice Role Plays Privacy Feature (VCO) VCO Answering Machines Voice to VCO Two Line VCO	Variations Practice Role Plays Desensitization Observe Review for Test #2 Typing Practice/Tests if necessary
DAY 5	Review Surveys (TTY - Voice and Voice- TTY)/ Observe Billing/ Immediate Credit Prepaid Calling Cards Roaming	Deaf Culture: ASL Worksheets ASL Workbook Practice Role Plays Administer Test #2 *Typing Practice/Tests if necessary
DAY 6	Review Changing CAs - Video and Call Takeover Process Directory Assistance Sprint International/ 900 calls HCO - Non Branded HCO - Branded Voice - HCO HCO Answering Machines	Practice Role Plays ASL Translation – Presentation by staff interpreter or individual with experience Observe - Type Review for Test #3 HR - Benefits *Typing Practice/Tests if necessary
Day 7	Review Practice Role Plays Customer Service Operator Services for the Deaf (OSD)	Device to Device Administer Test #3 Observe - Talk *Typing Practice/Tests if necessary
DAY 8	Review Practice Role Plays - VCO Final - VCO Surveys/ Observe ASL Translation Customer Database (CDB) Features	Emergency/ Threats Help Screen Review Take Calls - assisted Review for Test #4 *Typing Practice/Tests if necessary

TRS TRAINING SCHEDULE		
DAY 9	Review Variations Practice Role Plays Return ASL Workbooks and Discussion Adherence/Trades/OT - OA Presentation	Administer Test #4 Overview of Federal Relay Take FRS Calls - assisted Review for Test #5 *Typing Practice/Tests if necessary
DAY 10	Administer Test #5 Final Review/ Questions & Answers Detachment Life After Training Complete Typing Tests if necessary	Graduation Take Calls Take digital pictures for Sprint ID Badge

Figure 1 - TRS CA Training Schedule

Topics Covered During Training

The following is a comprehensive list of all training topics covered by Sprint during initial training.

TRAINING TOPICS		
Orientation	Welcome and Introductions Introduction to Each Other Sprint Nextel Corporation (or Vendor Company) Sprint ahead Values Sprint Nextel Overview History of Sprint Corporation Founders Long Distance Local Telecommunications PCS	Internet Services Product Distribution The Sprint Campus The Sprint Nextel Merger Telecommunications Relay Service What is Relay? Relay Agent Training Relay- Connect to Your Future Video Observation Guidelines How a Call Reaches Sprint Nextel Relay
Connecting to Relay	The Role of a Relay Agent Connecting to Relay 711 Dedicated Toll-Free Numbers Equipment TTY TTY Basics TTY Etiquette Closing a Conversation Agent Responsibility Call Set Up Call Closing TTY to Voice Closing a Conversation Operator Role Closure Operator Close Protocol Guide: Disallowed Calls Glossary of Abbreviations and Terms TTY Practice Session Auto-Corrected Abbreviations Standard Abbreviations Typing Variations Internet Characters Non-Baudot Supported Characters Verbatim - Style Contraction Spelling Punctuation Agent/Operator Role SKSK Background Noises While TTY user is Typing Typing Monetary Units	Sprint IP User Connects to Agent but wants Customer Service Sprint IP Two Line VCO FRSO- Federal Relay Service Online FRSO call processing FRSO Reporting FRSO variations Sprint IP/FRSO International Calling Sprint IP/FRSO Variations Sprint IP/FRSO Fast Busy Sprint IP/FRSO Two Line VCO Sprint IP/FRSO Conversation Lag Time Sprint IP/FRSO Interrupts Voice to AIM (AOL) VM Greeting Voice to AIM procedures Voice to AIM variations Blocked screen names - suspect international locations. Cellular and Wireless Phones Video Relay Service Blackberry Devices and Pagers TTY Public Payphone Sprint National Relay Sprint International (SI) Inbound international calling Sprint International Variations Non-Standard TTY Outbound International calling Transfer Menu

TRAINING TOPICS		
	711 TTY Garble During Typing XXX to Correct Typing Error Other Communication Devices Data Transmission Speed Turbo Code Turbo Code Interrupt Enhanced Turbo Dial Through - (ETurbo) Disable Turbo Code Mode ASCII - American Standard Code Information Interchange ASCII Interrupts Sprint IP - Internet Relay Sprint IP call processing Internet Relay variations Sprint IP RELAY: Internet & IM access 'GA' is optional Sprint IP Standard Service Explanation Text Flow Interruptions without garble Conversational flow ASL Emoticons – Smileys – Text Message Abbreviations IP Acronyms Sprint IP Variations 911 Emergency Calls Spanish and French Language Service International calling restrictions Sprint IP Correctional facilities/Jails Info Digit list	Reseller call processing CapTel Relay to CapTel CapTel to Relay CapTel Transfers Dedicated State CapTel Transfer Alternate Languages Spanish Language Customer Service Relay Caller ID True Caller ID Per Call Block Per Line Block Permanent Call Blocking Caller ID Blocking - True Caller ID – SS7 Connecting Variations Misdialed Relay Phrase Dialed 711 Instead of 911 711 Spanish Request for Relay Numbers Cellular/Wireless problem reaching 711 611/811 (LEC Service Access) 700 900 Numbers and Call Processing Correctional Facility/Prison Calls FAQS on the Use of Relay through Correctional Facilities: Correctional Facility Call Processing Relay Abuse
Overview of System and Equipment	System Overview Login/Logout Agent Profile The Mouse Clicking the Mouse Dragging/Dropping Copy/Paste Drop Down Boxes Lists Radio Button Scroll Bars Sliders Tables Tables Accessing a Program Screen Displays Call Handling Screen Title Bar Banner Conversation Area Disconnect Message Status Color Scheme Agent Text Transmission Cancel Key Information Bar Profile Help Call Type	Dial Window Scratch Pad Transfer Panel Headset Panel Status Bar Record Feature Function Keys Block Ctrl-Switch Switch The Keyboard Alpha Keys Function Keys Call Handling Keys Numeric Keys Cursor Movement Keys Arrow Keys Backspace Error Correction Function Single Word Edit Function Word Substitution Feature Macros Table Function Keys Ctrl-Function Keys Glossary of Telephony Terms Background Noises Voice Tones/Descriptive Words Standard Abbreviations
Phone Image	Professional Phone Image	Voice Person Speaking in 3rd Person

TRAINING TOPICS		
(Tone of Voice)	How phone image is created Provide warm and friendly greeting Conversational Tone Voice Inflection Audibility and breath control Pitch Quality Operator Role Relay Role Relay Skills Conversational Flow Staying focused Listening skills Customer service skill Coping skills Phrases Background Noises Voice Tones/Descriptive Words Transparency and Caller Control	Pacing the Voice Customer Brief pacing phrases Repeating information Voice Customer does not say "GA Handling Interruptions Voice Tone How Phone Image is Created Provide a Warm Greeting Why Conversational Tone? Transparency, Caller Control & Confidentiality Rudeness, Types of Create an Exceptional Customer Experience Greeting Announce Closing Suggested Redirect Phrases
TTY to Voice and Voice to TTY	TTY to Voice Introduction Connecting to the outbound customer Announcement Explanation of service Deaf or hard of hearing Explanation International Announcement TTY to Voice Procedures TTY to Voice Specific Person Request Variations Specific Person Request TTY to Voice Answered TTY Voice Person Not Available TTY to TTY Call Release TTY to Voice Ans. TTY (TTY to TTY) TTY to TTY Specific Person Request TTY to Voice No Answer Types of Busy Signals Redialing	TTY to Voice Busy Signals Regional 800 Voice to TTY Voice to TTY Introduction Connecting to the outbound customer Voice Greeting Vice call progress Announcement Voice to TTY call (Hearing Person Answer) Explanation of service Voice to TTY Procedures Voice to TTY Specific Person Request Voice to TTY Answered Voice Voice to TTY No Answer Voice to TTY Busy Signal
Branding	Inbound Answer Type Branding Database Branding	Branding procedures
Recordings, Answering Machines, Pagers and AMR	Introduction Recording Feature Information Line Recording (TTY/Voice) Touch Tone Dialing Using Touch Tones (TTY/Voice) Audio text interaction Variations for Recordings Record Feature Tips TTY-Voice Recordings TTY-Voice Recording Information TTY-Voice Answering Machine Variations: Ans Mach/Recording/Pagers Voice Mail Retrieval	AMR (Answering Machine Retrieval) TTY-Voice Pager/Beeper (known) TTY-Voice Pager/Beeper (unknown) Voice to TTY Pager Voice to TTY Answering Machine Other Recording Variations Voice Mail System Privacy Manager/Call Intercept Automatic Redial System Recordings Switchboards Redialing Voicemail thru Switchboard TTY-Voice Asking for Specific Person Live person On Ans Mach Redial
VCO (Voice Carry Over)	VCO Introduction VCO Announcement VCO Service Explanation VCO Equipment Non-Branded VCO Branded VCO VCO No Answer VCO Busy VCO Privacy	Reverse Two-Line VCO Intro Reverse Two-Line VCO Procedure VCO Variations VCO comes in Voice Line 2LVCO Conference Calls VCO Requests Relay to give Relay # VCO Privacy while leaving message VCO Voice Mail Retrieval 2LVCO Voice Mail Retrieval

TRAINING TOPICS		
	VCO Answering Machine Voice to VCO Answered TTY Voice to VCO Answered VCO Two-Line VCO (2LVCO) Intro Two-Line VCO (2LVCO) Procedure	VCO Types and Voices Inbound Customer Requests VCO/HCO VCO Requests CA gives name in notes
Billing	Introduction Local call description Paid by Inbound Over Sprint Network Toll Free Calls Calls that Cannot Be Processed COC (Carrier of Choice) Paid by Inbound Paid by Inbound Alternate Carrier of Choice Alternate Billing (Intro) Billing Options Collect FONCard (Sprint) Description LEC calling card Other long distance calling card Paid by Inbound Third Party Carrier of Choice Pre-paid calling cards Billing Procedures Calling Cards Paid Billing with COC (TTY-Voice) Paid Billing with COC (Voice-TTY) TTY/Voice Pre-Paid Calling Card/800 Card Voice/TTY Pre-Paid Calling Card/800 Card Voice-TTY Collect Specific Person Request	Calling Card -- TTY Originated Calling Card -- Voice Originated Collect Calls Collect Call Intro TTY-Voice Collect Specific Person Requested Person-to-Person Call Person-to-Person Call Processing Collect Call -- TTY-Voice Collect Call -- Voice/TTY Third Party Billing Third Party Billing Intro 3rd Party TTY-Voice Billing Voice Number 3rd Party TTY-Voice Billing TTY Number 3rd Party Voice-TTY Billing TTY Number Immediate Credit Inbound tells wrong # Agent dials wrong # Marine Roaming Feature Restricted Roaming Unrestricted Roaming Billing Variations
HCO (Hearing Carry Over)	HCO Intro HCO Announcement HCO Service Explanation Speech Disabled “S” Non-Branded HCO Branded HCO HCO with Privacy HCO No Answer HCO Busy HCO-Voice Answering Machine	Voice-HCO Answered Voice-HCO Answered TTY (1) (2) Voice-HCO recorded message answers Two-Line HCO (2LHCO) Intro Two-Line HCO Procedure Reverse Two-Line HCO HCO Variations Inbound requests VCO/HCO HCO User Requests to Speak
Customer Database	Enhanced Customer Database Profile Household Profile Edit Household Profile Navigating Customer Database Household Profile Panels Notes Frequently Dialed Numbers Personal Information Preferences COC Restrictions Blocked Emergency #s Speech to Speech STS Messages	Customer Profile Introduction Use/Edit/New/Delete Customer Profile Verify Customer Password for Agent Verify Customer Password -- CSR Only Customer Profile Panels Personal Info Notes Frequently Dialed #s Preferences Emergency #s Speech to Speech STS Messages Database Profile Macros
Directory Assistance	DA Intro Interstate Directory Assistance Intrastate Directory Assistance Automated DA	Call Processing -- Calling from International Number Sprint International Variations Non-Standard TTY

TRAINING TOPICS		
	DA City& State Given; Area Code Unknown DA Variations Sprint International International Transfer Menu Call Processing -- Calling to International Number	Answered Foreign Language Transfer Menu 900 # Call Processing 211/311/511 Requests
Device to Device Calls	Device to Device Intro Function Keys and Banner Messages VCO to TTY and TTY to VCO VCO to VCO TTY to HCO and HCO to TTY	VCO to HCO and HCO to VCO HCO to HCO Device to Device Variations Alternate Call Type reaches recording
Call Processing Variations	CA information Area Code Only In From Number Conversational Flow Static or Poor Connection Profanity towards Agent Redialing Young Children Inbound Does Not Connect Inbound ASCII Charges Refused 800 Number Tone Judgments Repeating Information Restricted Calls Two calling from numbers LEC Service Office 611/811 Double Letters Call Waiting Feature Conference Calls Party Line Calls Three-Way Calling Hard of hearing Customer Ans TTY Line Spanish Calls to TX Sp Speaking Agents Request for Alternate Language Caller Types in Alternate Language Voice Customer Hangs Up During a Call Variable Time Stamp Customer Misdialed Phrase TTY Customer Hangs Up During a Call Non Standard TTY Capability Relaying Internet Characters TTY User Does Not Type GA Dispatch Calls – Pizza, Taxi, Carry-out Customer Referral Guidelines V-T Calls answered by Fax Customer Requests Holding for Inbound prior to out dial Request for Company Information Request for Information Request for M or F Agent Request Specific Agent Agent Knows Customer Request for Relay Number Customer Requests to Call Relay Service Request for Calling From Number Request Telephone Number Referral Request for Date/Time Customer Requests Agent to Modify Call	Request for Length of Call Request Long Distance Information T-V Call and V Requests Supervisor Call Backs for TTYs Multiple Calls Sensitive Topics Suicide Abuse Illegal Calls Answering Machines Hangs Up Before Message Left Do Not Type Recorded Messages Answering Machine Full Change Answering Machine Message VCO Requests Leave Message 1st out dial Leaving a Message V-TTY Ans V Retrieving Messages from TTY V Ans Mach TTY Screener Request to Leave TTY Message on Ans Mach Recordings Regional 800 TTY Requests “Dial That Number” Recording with Relay Option Alternate Call Recording Reached English/Spanish Pound Touch Tone Phone Advertisements Do Not Type Recordings Get Live Person/Rep Conversation Being Recorded Dial Number from Recorded Announcement VCO Conference Calls Leave Relay Number Voice Mail Retrieval VCO Types and Voices Prompting Data Transmission Box Prompting VCO on Hold Requests VCO/HCO HCO Requests VCO/HCO Alternate Call Type Recording Bridge Left Open

TRAINING TOPICS		
Call Take Over Procedures	FCC Rule Protocol and process flow TTY-Voice and Voice-TTY ASCII	VCO VCO to VCO HCO VCO-TTY and TTY-VCO
Customer Service	Functions Language Services	Procedures
OSD	Operator Services for the Deaf (OSD) Functions	OSD to TRS TRS to OSD
Transparency	Non-Emergency Calls Emergency Center Evacuation	Network Failure
Emergency Call Procedures	Emergency Calls Intro Emergency Services FCC Requirements Emergency Call Processing Emergency Reporting TTY-Emergency Voice-Emergency	TTY-Emergency TTY Call Release Internet-Emergency Internet (IP) Emergency Instant Messenger (IM) Emergency Emergency Call Processing Variations Emergency Form
Federal Relay Service	FRS Intro FRS Announcement FRS Service Explanation FRS Relay Procedures Federal Relay Service call types	FRS Confidentiality Policy FRS Customer Information Requests FRS Customer Contacts FRS Reporting
STS (Speech-to-Speech)	Speech To Speech Training Outline STS Introduction and History STS Description Disabilities Characteristics of STS users Stereotypes Clarifying Phrases Phrases to Avoid STS Phone Image STS Agent Tools Consistency Patience Ask Yes or No Questions No Personal Conversation Phrases You Can Use Speech to Speech Alphabet Transparency/Call Control/Confidentiality	Ways to Reduce/Streamline Notes Standard Abbreviations (STS) STS-Voice Voice-STS STS VCO-Voice Voice to STS VCO (TTY answer r) Voice to STS VCO (VCO answer) STS VCO -- 2 Line VCO TTY-STS STS-TTY Non-branded HCO to STS STS-HCO STS Hold Message STS Call Takeover Confidentiality and Transparency Personal Conversations requests Speech to Speech Variations
Healthy Detachment	Healthy Detachment Intro Objectives Survival Skills Relay Traps	Perception Ways to Reduce Stress Hospitality Phrases
Healthy Relay	A healthy approach toward Relay Introduction Objectives Ergonomics Stretching Exercises Agent Reinforcement Ergonomic Review	Setting up Workstation GUAM - Get Up and Move Ergonomic Relief Slowing the Customer Down Overtime Relaxation
Adult Learner	Understanding the Needs of the Adult Learner The Learning Continuum Use of Different Modalities Adult Learning - Edgar Dale's Cone of Experience Elements of Lesson Design Focus The Adult Learner Objective and Purpose Input	Modeling Checking For Understanding Guided Practice Independent Practice Summary Evaluation How to Give Effective Instruction Questioning Guidelines Feedback - Training and Coaching

TRAINING TOPICS		
		Technique Trust in Management
Assessing Performance	The Assessment Process in Training Assessment Time - What is involved? Practice Time Spelling Test Written tests Side by side evaluations Typing	Acceptable Time Frame Acceptable Is Relative Ways to “Coach” Feedback Maintain Self-esteem and Motivate Pass/Fail Guidelines Introduce Assessment Form Form Set-Up
Introduction to Diversified Culture	Introduction to Diversified Culture Objectives Who Uses Relay Understanding Our Customer Special Communication Needs Pathological vs. Cultural View of Deafness Characteristics of Deafness The Deaf Community	Why is there Deaf Culture? Attachments: What Do You Know About Deafness (Q) What Do You Know About Deafness (A) Myths About Deafness Two Views of Deafness Loudness Levels
Deaf Heritage	History in Europe History in North America Alexander Graham Bell	Edward Miner Gallaudet Oral / Combined Debate
The Deaf Community	Introduction to the Deaf Community National Association of the Deaf Contributions to Society Mainstreamed Schools	American Athletic Assn. of Deaf National Theatre of the Deaf Assistive Devices Gaining Acceptance in the Deaf Community
The Deaf Community	Sign Language Interpreters Different Communication Systems Exposure to English DEAF President Now Attitude Changes toward the Deaf Community	Changes in the Deaf Community Rules for Using a Sign Language Interpreter Interpreting Standards
American Sign Language Part 1	What is ASL? History of ASL ASL Recognized as Language	Rules of ASL Five Parameters of ASL English vs. ASL Idioms
American Sign Language Part 2	Evolution of ASL ASL Syntax	Translate ASL to English and Vice Versa
TTYPhony and TTY Courtesy	First Teletypewriter Evolution of the TTY Telecommunications Laws of Accessibility	TTY Courtesy Development of Relay Service Market
Hard of hearing and Late Deafened Customers	Hard of hearing and Late Deafened Customers Characteristics of Deaf Customers Assistive Devices for Deaf Customers	Establishment of Self Help for Hard-of-Hearing People (SHHH)(Now the ‘Hearing Loss Association of America’ (HLAA)) Relaying for Deaf Customers
Characteristics of late-deafened Customers	Establishment of Association of late-Deafened Adults (ALDA) Relaying for late-deafened Customers	Deaf-Blind, Speech-Challenged, Spanish Speaking and Hearing Customers
Characteristics of Deaf-Blind Customers	Assistive Devices for Deaf-Blind Customers Relaying for Deaf-Blind Customers	Deaf-Blind Pacing – allows the CA to slow down the transmission to the Braille machine
Characteristics of Relaying for other users	Speech-Challenged Customers Spanish-Speaking Customers	Hearing customers
Ethics and Confidentiality	Interpreting Standards The ADA and FCC regulations for the Provision of	TRS Rules – Operator Standards Relay Center Agreement Regarding

TRAINING TOPICS		
	TRS Regulations pertaining to call content	Confidential Customer Information.

Appendix C:

TRS Pledge of Confidentiality

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Agreement Regarding Confidential Information

SPRINT TRS RELAY CENTERS AGREEMENT REGARDING CONFIDENTIAL CUSTOMER INFORMATION

IN CONSIDERATION of: (1) my employment with Sprint/United Management Company or any subsidiary, affiliate, or successor-in-interest of Sprint Corporation ("Sprint"), (2) my continued employment as long as mutually agreeable, and (3) the opportunity to receive Sprint confidential customer information or other good and valuable consideration:

AS AN EMPLOYEE OF THE RELAY SERVICES ORGANIZATION, I UNDERSTAND THAT I AM BOUND BY ALL SPRINT POLICIES AND SPECIFICALLY, I AGREE AS FOLLOWS:

1. ALL TELECOMMUNICATIONS RELAY SERVICE CALL RELATED INFORMATION SHALL BE KEPT STRICTLY CONFIDENTIAL. I will not reveal any information acquired during or observing a relay call. I will only discuss call-related questions or problems with management or Human Resources. I agree to keep confidential all information I learn in my position for the duration of and after my employment with Sprint ends.

2. NO RECORDS OF CUSTOMER INFORMATION OR CONTENT OF ANY TELECOMMUNICATIONS RELAY SERVICE CALL SHALL BE KEPT BEYOND THE DURATION OF THE CALL, WITH LIMITED EXCEPTIONS FOR AUTHORIZED COMPANY PROCEDURES. I will not keep a record of any customer information or conversation content beyond the duration of the call except in accordance with company procedures for relaying Speech to Speech calls or for billing and customer profile purposes. I will destroy all such records in my possession immediately upon completion of their authorized use.

3. NOTHING MAY BE EDITED OR OMITTED FROM THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will transmit exactly what is said in the way that it is intended in the language of the customer's choice.

4. NOTHING MAY BE ADDED OR INTERJECTED INTO THE CONTENT OF THE CONVERSATION OR THE SPIRIT OF THE SPEAKER. I will not advise, counsel, or interject personal opinions, even when asked to do so by the customer.

5. TO ASSURE MAXIMUM CUSTOMER CONTROL, I WILL BE FLEXIBLE IN ADAPTING TO THE CUSTOMER'S NEEDS.

6. I WILL STRIVE TO FURTHER MY SKILLS AND KNOWLEDGE THROUGH CONTINUED TRAINING, WORKSHOPS, AND READING OF CURRENT LITERATURE IN THE FIELD.

7. ALL SPRINT MATERIALS IN MY POSSESSION PERTAINING TO ANY SPRINT CUSTOMER WILL BE DELIVERED UPON THE TERMINATION OF MY EMPLOYMENT.

I have read and understand the Sprint Relay center Agreement Regarding Confidential Customer Information. I agree to comply and understand that failure to do so will lead to company disciplinary action that may result in my termination and/or criminal prosecution. I also understand that

ascertaining damages resulting from a breach of this agreement would be difficult. I agree that Sprint shall have the right to an injunction against me, enjoining any such breach without any obligation to post bond. I agree that this will be in addition to and without limiting any other remedies or rights Sprint may have against me.

EMPLOYEE SIGNATURE DATE

MANAGER/SUPERVISOR SIGNATURE DATE

CAPTEL CONFIDENTIALITY

Information obtained during a CapTel call should not be shared with any person except a member of the CapTel management staff who has asked for specific information. This information may be needed to clarify technical, policy, emergency, venting, consumer or customer service issues. General call information will not be shared unless it is used to clarify, vent, or teach. Information about call content should be discussed in a private area only.

Only information critical to resolving the situation will be disclosed. This may include consumer name, name of business/agency, gender of caller, type of call (voice in, CapTel in), day of week, time of day, city, state, or any other details that could in some way identify a consumer.

A Captionist may feel the need to "vent" about a call due to problems, complaints or stress from handling the call. The Captionist may ask to speak to a Supervisor or other member of management (as long as it wasn't their call) in a private area. Clarify before the conversation you wish to "vent" about a call.

The success of CapTel depends on quality and complete confidentiality. Consumers will be less likely to use the service if they feel their personal and professional calls are not kept in the strictest confidence. It is very important all Captionists understand and abide by the confidentiality policy. Any Captionist who breaks this policy will be disciplined, up to and including termination.

Confidentiality Policy

- I will not disclose to any individual (outside of a member of the CapTel management staff) the identity of any caller or information I may learn about a caller (including names, phone numbers, locations, etc.) on any CapTel call.

- I will not act upon any information received while processing a CapTel call.

- I will not disclose to anyone the names, schedules, or personal information of any fellow worker at CapTel Inc.

- I will not share any information about CapTel calls with anyone except a member of the CapTel Inc. management staff in order to investigate complaints, technical issues, etc.

- I will continue to hold in confidence all information related to the work and calls I have performed while at CapTel Inc. after my employment ends.

- I will never reveal my Captionist ID number in conjunction with my name unless asked by a member of the CapTel Inc. management staff.

- I will not share with anyone any technical aspect of my position at CapTel Inc. unless asked by a member of the CapTel Inc. management staff.

- I will not talk about consumers or call content with any fellow Captionists.

- I will not listen to or get involved in calls taken by fellow Captionists.

I have read the above Confidentiality Policy and understand a breach of confidentiality will result in disciplinary action up to and including termination of employment at CapTel Inc. I recognize the serious and confidential nature of my position and therefore promise to abide by these guidelines.

Employee Name

Date

Appendix D:

Sprint Carrier of Choice Letter of Invitation

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<insert date>

<insert carrier name>

<insert contact name>

<insert tel nbr or fax nbr>

<insert email address>

Re: <insert customer (end user name)>, <insert telephone number>

Thank you for your interest to complete <insert carrier name> Toll calls with Sprint Telecommunications Relay Service (TRS). As the default Toll carrier for processing relay calls in more than thirty-two states (32), Sprint currently transports the traffic of customers who have selected you as their Toll carrier. However, many of your customers would prefer to use <insert carrier name> LD for their toll calls. At present, Sprint TRS is unable to send the toll calls from the regional centers or state access tandem to your network. Hence, this letter is being written to make you aware of a potential service-impacting issue regarding TRS calls and measures your company can take to ensure your customers' toll calls are completed through TRS.

The Americans with Disabilities Act of 1990 mandate TRS, and TRS standards are established and are monitored by the Federal Communications Commission (FCC). TRS is a service that links telephone conversations between standard (voice) telephone users and people who are deaf, hard of hearing, deaf-blind, or speech disabled using Text Telephone (TTY) equipment. The State Public Utilities Commission manages the day-to-day operations of TRS and has contracted with Sprint Corporation to provide relay service in their states.

Both, the Americans with Disabilities Act of 1990 and FCC's Order 00-56 on TRS mandate that all states provide TRS and that TRS users shall have equal access to their chosen interexchange carrier and to all other operator services, to the same extent that such access is provided to voice users. In order to provide this access to your customers, your company is encouraged to submit a letter of authorization to accept TRS calls from Sprint.

Attachment A lists the facility-based providers who currently participate at Sprint TRS Carrier of Choice program. If your company (or your facility based provider) is not currently listed, please review the following and determine the appropriate follow-up action needed to be taken:

Facility-based provider

1. If you are a participating member at Sprint Carrier of Choice program, please disregard.

2. If you are not a participating member at Sprint Carrier of Choice program, you need to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below). You will need to provide Sprint with your toll carrier's SS7 Network Transit Selector information.

Non-facility based provider

1. If your underlying toll carrier is a participating member at Sprint Carrier of Choice program, Sprint can implement the IXC brand name and pass the toll call information to the underlying carrier's CIC code and SS7 Transit Network Selector information. Please submit a letter of authorization that would advise Sprint to implement the carrier brand name and to send the toll call information to its underlying toll carrier.

2. If your underlying toll carrier is not a participating member at Sprint Carrier of Choice program, you will need to work with your underlying toll carrier to establish a network presence at the regional centers or state access tandem and accept calls from Sprint through the industry method of SS7 trunking and TRS billing codes of Info Digit Pair 60, 66, and 67 (see below). You will need to provide Sprint with your toll carrier's SS7 Network Transit Selector information.

Before you submit a letter of authorization to Sprint TRS, please consider the following four factors:

1. Your (or your underlying toll carrier) CIC codes and SS7 Transit Network Selector information associated with 1+, 0+, and 0- and International dialing must be loaded into the regional (and/or state) access tandems.

2. You (or your underlying toll carrier) will need to support SS7 tandem interconnection.

3. You (or your underlying toll carrier) will need to ensure that your translation tables are updated in order to appropriately receive, rate, and bill Sprint calls per Bellcore industry standards. Sprint calls are designated as ANI II Digit Pair 60, 66, and 67.

4. If you utilize more than one underlying toll carrier to carry the toll traffic, select a single toll carrier that will accept Sprint traffic.

Note: For detailed information regarding access tandem interconnection and carrier of choice provisioning through Sprint, please refer to ATIS/NIIF-008, the "Telecommunications Relay service – Technical Needs" document.

Attachment B lists Sprint TRS Access Tandem Interconnection locations. The best way to provide access to your Toll network through relay service for your customers is to designate the 8 Sprint Regional TRS center/Access Tandem combinations as the points at which Sprint will hand off Toll relay service traffic to you. In this manner, any relay caller that wishes to use your services may be efficiently, and with

minimal time delay, routed to your network. Should you not have a presence at one or more of the Sprint regional center/access tandem combinations, the traffic may be handed off at one of the regional center's access tandem.

Attachment C is a sample letter of authorization. Once Sprint receives your written request to participate in the Sprint TRS Carrier of Choice program, Sprint will schedule translation updates in the next available release (usually 30 to 90 days). Information obtained from the carriers will be used solely for the purpose of providing equal access for <insert carrier name> LD customers and shall be held proprietary.

Sprint welcomes your company's participation in our TRS Carrier of Choice program at no cost to you if your company has network presence at any of our listed regional center/state access tandem locations. Your participation at the Sprint Carrier of Choice program will create a win-win situation for our customers. Through Sprint, as the relay provider, customers will be able to enjoy uninterrupted service and your company will be able to generate additional revenue.

Thank you for your prompt attention to this matter. If you have any questions concerning with the letter, please do not hesitate to call me at <xxx-xxx-xxxx> or email at <insert email address>

Sincerely Yours,

<insert name>

Program Manager, <insert state(s)>

Sprint Relay

CC: Michael Fingerhut, Federal Regulatory, Sprint

<insert name>, Program Manager, Sprint

Appendix E:

Disaster Recovery Plan

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Appendix E: Disaster Recovery Plan and Network Support Plan

Sprint's comprehensive Disaster Recovery Plan details the methods Sprint will utilize to cope with specific disasters. The plan includes quick and reliable switching of calls, Sprint's TRS network diagrams identifying where traffic will be rerouted if vulnerable circuits become inoperable, and problem reporting with escalation protocol. Besides service outages, the Disaster Recovery Plan applies to specific disasters that affect any technical area of Sprint's Relay network.

The first line of defense against degradation is the Sprint's Relay dynamic call routing that Sprint employs. During a major or minor service disruption, the Sprint's Relay dynamic call routing network feature bypasses the failed or degraded facility and immediately directs calls to the first available Relay Operator in any of Sprint's fully inter-linked TRS Call Centers. ROs are trained in advance to provide service to other States; the transfer of calls between Centers is transparent to users.

Beyond the Sprint's Relay dynamic call routing network, Sprint's TRS Disaster Recovery Plan details the steps that will be taken to deal with any Relay problem, and restore Telecommunications Relay service to its full operating level in the shortest possible time.

STATE NOTIFICATION PROCEDURE

To provide the State with the most complete and timely information on problems affecting Relay service, the trouble reporting procedure will include three levels of response:

- An immediate report (as defined in the contract)
- A 24-hour status report
- A comprehensive final report within 5 business days

Sprint will notify the designated representative of the State within fifteen minutes if a Relay service disruption of 30 minutes or longer occurs. The report will explain how the problem will be corrected and an approximate time when full service will be restored. Within 24 hours of the Relay service disruption, an intermediate report provides problem status and more detail of what action is necessary. In most cases, the 24-hour report reveals that the problem has been corrected and that full Relay service has been restored. The final comprehensive written report, explaining how and when the problem occurred, corrective action taken, and time and date when full operation resumed will be provided to the Contract Administrator within five business days of return to normal operation. Examples of Relay service disruption include:

- TRS Switching System failure or malfunction
- Major transmission facility blockage of the last-leg circuits to the Relay Call Centers
- Threat to RO safety or other RO work stoppage
- Loss of RO position capabilities

Performance at each Sprint Relay Center is monitored continuously 24-hours-a-day, seven-days-a-week from Sprint's Service Assurance Monitoring Center (SAMC) in Overland Park, KS.

DISASTER RECOVERY PROCEDURES

If the problem is within a relay center, maintenance can usually be performed by the on-site technician, with assistance from Sprint's SAMC. If the problem occurs during non-business hours and requires on-site assistance, the SAMC will page the technician to provide service remedies. Sprint retains hardware spares at each center to allow for any type of repair required without ordering additional equipment (except for complete loss of a center).

TIME FRAMES FOR SERVICE RESTORATION

Complete or Partial Loss of Service Due to Sprint Relay Equipment or Facilities

- ### Sprint Relay Call Center Equipment

  A technician is on-site during the normal business day. The technician provides parts and / or resources necessary to expedite repair within two hours. Outside of the normal business day, a technician will be on-site within four hours. The technician then provides parts and /or resources necessary to expedite repair within two hours.

- ### Sprint or Telco Network

  Facilities or an outage of facilities directly serving incoming TRS Relay calls will immediately be routed to one of the other Centers throughout the US. No inbound calls will be lost. Repair of Interexchange and Local Exchange fiber or network facilities typically requires less than eight hours.

- ### Due to Utilities or Disaster at the Center

  Immediate rerouting of traffic occurs with any large-scale Relay Center disaster or utility failure. Service is restored as soon as the utility is restored, provided the Sprint Relay equipment has not been damaged. If the equipment has been damaged the service restoration for Sprint equipment (above) applies.

- ### Due to Telco Facilities Equipment

  A Telco equipment failure will not normally have a large effect on TRS traffic within the state unless it occurs on Telco facilities directly connected to the relay call center. In this case, normal Sprint Relay traffic rerouting will apply.

TROUBLE REPORTING PROCEDURES

The following information is required when a user is reporting trouble:

- Service Description
- Callers Name
- Contact Number
- Calling to/Calling from, if applicable
- Description of the trouble

Service disruptions or anomalies that are identified by users may be reported to the Sprint Relay Customer Service toll-free number at any time day or night, seven days a week. The Customer Service operator creates a trouble ticket and passes the information on to the appropriate member of Sprint's Maintenance Team for action. Outside the normal business day, the SAMC will handle calls from the Customer Service RO 24 hours a day, 7 days a week. The Maintenance Team recognizes most disruptions in service prior to customers being aware of any problem. Site technicians are on call at each of Sprint's twelve sites across the United States TRS call centers to respond quickly to any event, including natural disasters.

MEAN TIME TO REPAIR (MTTR)

MTTR is defined and detailed in Tables 1 and 2:

Time to Investigate	The time needed to determine the existence of a problem and its scope.
Time to Repair	Repair time by Field Operations plus LEC time, if applicable.
Time to Notify	From the time repair is completed to the time the customer is notified of repair completion.

Table 1 – Time to Investigate + Time to Repair + Time to Notify

Switched Services	8 Hours
Private Lines	4 Hours (electronic failure)
Fiber Cut	8 Hours

Table 2 – Current MTTR Objectives

Sprint's Mean Time to Repair is viewed from the customer's perspective. A critical element in the equation is the Time to Notify, because Sprint does not consider a repair complete until the customer accepts the circuit back as satisfactory.

ESCALATION PROCEDURES

If adequate results have not been achieved within two hours, the Contract Administrator or a user may escalate the report to the next level. The table below details the escalation levels.

Escalation Level	Contact	Phone

2	Regional Maintenance Manager	Office Phone Number (913-794-1130)
3	Senior Manager, Technical Staff	Office Phone Number 913-794-3603

Network Support Plan

NETWORK DESIGN

Sprint's service is provided over an all-fiber sophisticated management control networks that support backbone networks with digital switching architecture. These elements are combined to provide a highly reliable, proven, and redundant network. Survivability is a mandatory objective of the Sprint network design. The Sprint network minimizes the adverse effect of service interruptions due to equipment failures or cable cuts, network overload conditions, or regional catastrophes.

A 100 percent fiber-optic network provides critical advantages over the other carriers. These advantages include:

Quality

Since voice and data are transmitted utilizing fiber optic technology, the problems of outdated analog and even modern microwave transmission simply do not apply. Noise, electrical interference, weather-impacting conditions, and fading are virtually eliminated.

Economy

The overall quality, architecture, and advanced technology of digital fiber optics make transmission so dependable that it costs us less to maintain, thereby passing the savings on to our customers.

Expandability

As demand for network capacity grows, the capacity of the existing single-mode fiber can grow. Due to the architecture and design of fiber optics, the capacity of the network can be upgraded to increase 2,000-fold.

Survivability

Network survivability is the ability of the network to cope with random disruptions of facilities and/or demand overloads.

Sprint has established an objective to provide 100 percent capability to reroute backbone traffic during any single cable cut. This is a significant benefit to _____, and a competitive differentiation of the Sprint network.

Network switched services are provided via 49 Southern Telecom DMS-250/300 switches at 29 locations nationwide. Three DMS-300s located at New York, NY; Fort Worth, TX; and Stockton, CA, serve as international gateways. The remaining 46 switches provide switching functions for Sprint's domestic switched services.

Interconnection of the 49 switches is provided in a non-hierarchical manner. This means that inter-machine trunk (IMT) groups connect each switch with all other switches within the network. Each of these IMT groups is split and routed through the Sprint fiber network over SONET route paths for protection and survivability. As an extra precaution to preclude any call blockage, Dynamically Controlled Routing (DCR) provides an additional layer of tandem routing options when a direct IMT is temporarily busy.

Reliability is ensured through a corporate commitment to maintain or surpass our system objectives. Beginning with the network design, reliability and efficiency are built into the system. Sprint continues to improve the network's reliability through the addition of new technologies.

The effectiveness of this highly reliable and survivable network is attributed to the redundant transmission and switching hardware configurations, SONET ring topology, and sophisticated network management and control Centers. These factors combine to assure outstanding network performance and reliability for the State.

NETWORK CRITERIA

System Capacity

The Sprint network was built with the capacity to support every interLATA and intraLATA call available in the US. With the continuing development of network fiber transmission equipment to support higher speeds and larger bandwidth, the capacity of the Sprint network to support increasing customer requirements and technologies is assured well into the future.

Service Restoration

Sprint provides for the restoration of service in the event of equipment malfunctions, isolated network overloads, major network disruptions and national/civil emergency situations. In the event of service disruption due to Sprint's equipment, service typically is restored within four hours after notification. Sprint does everything possible to prevent a total outage at its switch sites or at any of its' POPs through the use of advanced site designs. All processors, memory, and switch networks within our switches are fully redundant. All switch sites are protected by uninterruptible power supplies and halon systems planned in conjunction with local fire departments. Most of our new sites are earth sheltered to increase survivability. A multi-pronged program is used to minimize outages:

Minimized "single points of failure" including:

- Diversification of all facilities' demands between switch sites. All switch sites are connected to the long haul network over at least two separate Sprint fiber routes; many have three paths.
- Deployment of multiple switches at large switching Centers. This prevents a single switch outage from disabling the site.

- Have systems in place allowing for the rapid redeployment of network resources in case of a catastrophic outage. Fiber cuts, which can affect thousands of calls at several locations, are sometimes unavoidable. Response to these outages is maximized through the following procedures:
- Utilization of established plans to respond effectively to these outages.
- The capability to rapidly deploy network transmission facilities when needed.
- Immediate execution of alternate routing in the digital switches and cross-connect systems to assist in the handling of temporary network disruptions and forced overloads.

The entire spectrum of survivability needs, expectations, and requirements can be met by the proper engineering of customer and Sprint switches and facilities.

FIBER BACKBONE LOOP TOPOLOGY AND RECONFIGURATION

Fiber optic cable routes are designed to include redundant capacity to insure survivable fiber optic systems. Sprint's SONET network, using four-fiber bi-directional line switched ring capability, allows automatic switching to alternate paths to provide for traffic rerouting in the event of a route failure. The SONET fiber optic backbone topology is currently designed with more than 100 overlapping rings to ensure sufficient alternate paths for total network survivability.

SPRINT ROUTE OUTAGE PREVENTION PROGRAMS

Call Before You Dig Program

This program uses a nationwide 1-800 number interlinked with all local/state government utility agencies as well as contractors, rail carriers, and major utilities. Sprint currently receives in excess of 60,000 calls per month for location assistance over the 23,000-mile fiber network.

Awareness Program

This Sprint program proactively contacts local contractors, builders, property owners, county/city administrators, and utility companies to educate them on Sprint's cable locations and how each can help eliminate cable outages.

Route Surveillance Program

This is a Network Operation's department program using Sprint employees to drive specific routes (usually 120 miles) and visually inspect the fiber cable routes. This activity is performed an average of 11.6 times per month or approximately once every 2-3 days.

- Technician Program

  Technicians are stationed at strategic locations and cover an area averaging 60 route miles. Each technician has emergency restoration material to repair fiber cuts on a temporary basis. Other operations forces within a nominal time frame accomplish total repair.

- Fiber/Switch Trending Program

  This includes a weekly summary of equipment failure events highlighting bit error rate (BER) and cable attenuation. As a result, Sprint identifies potential equipment problems and monitors performance degradation to establish equipment-aging profiles for scheduled repair, replacement, or elimination. Aging profiles are computer-stored representations of the characteristics of a fiber splice. The profile is stored at the time the splice is accepted and put into service. A comparison of the original profile and current profile are compared for performance degradation. Maintenance is scheduled based on this type of monitoring.

NETWORK MANAGEMENT AND CONTROL SYSTEMS

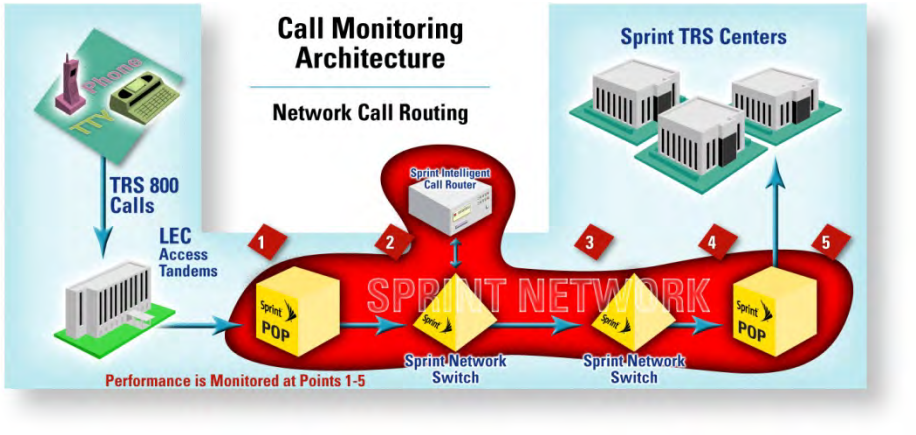
Surveillance for the Sprint network is managed by the Network Operations Center located in Overland Park Kansas. In the event of a network problem causing customer degradation of service, Network Operations will notify the Service Assurance Management Center (SAMC) of Sprint's TRS Group. SAMC will then notify the appropriate PSC with a description of the problem and an estimated time of repair.

INBOUND CALL ROUTING

Sprint incorporates a dynamic routing system that continuously monitors circuit and RO availability to ensure calls are answered within the required time frames. This includes reporting for the long distance network and equipment, which many Relay providers are unable to provide, as well as reporting for the Relay network.

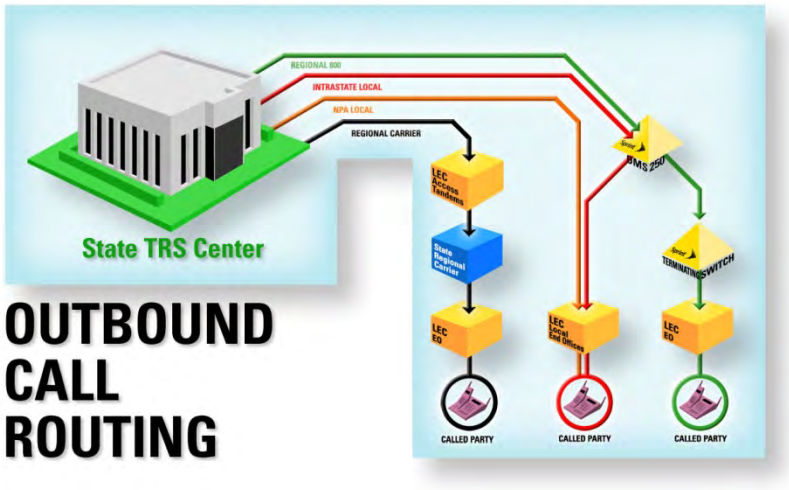
Sprint's inbound configuration ensures that if an issue is identified anywhere in the network, it will be promptly addressed and reported.

The Call Monitoring Architecture diagram in the figure below depicts the standard inbound call path to Sprint's Relay Center. Unlike other Relay providers, Sprint monitors each leg of the inbound call path at the points shown to ensure the call reaches the Relay Center with little to no blocking.



Call Monitoring Architecture Diagram

The Network Design Configuration for Outbound Calling in the figure below indicates the extensive complexity of Sprint's Relay platform, including standard call paths for local, intra-state, regional 800, and COC calls.



Outbound Routing Diagram

CapTel Disaster Recovery Plan

CAPTEL OUTAGE PREVENTION STATUS

Sprint will provide FCC compliant CapTel® service from the two CapTel call centers in Madison and Milwaukee, WI. Sprint's CapTel vendor CapTel Inc. (CTI) operates the two current CapTel and WebCapTel® call centers in the nation. These unique centers operate with enough terminals for 200 ROs each, along with support personnel, Technicians, and Supervisors.

Both CapTel call centers are equipped with redundant systems for power, ACD/telecom switching equipment, call processing servers, data network servers, and LAN gear. Most equipment failures can be corrected without complete loss of service.

Having two CapTel call centers ensures minimum interruptions in service if something unexpectedly halts operations in one center or the other such as a flood or a tornado. In those instances, traffic from one Center can automatically be routed to the other.

SPRINT OUTAGE NOTIFICATION FROM CAPTEL CALL CENTER

Performance at the CapTel call center is monitored continuously by CTI technicians 24 hours a day, seven days a week. Sprint will be notified by the CapTel Service Center Manager immediately upon determination of any type of natural or man-made problem that causes either:

- A complete (100 percent) loss of the CapTel Service Center, OR
- Any partial loss of service in excess of 15 minutes that is service affecting. Examples of such a loss in service include:
  - An accidental switch rebooting
  - Loss of transmission facilities through the telephone network
  - Terrorist attack
  - Bomb threat or other work stoppage
  - Sudden loss of agent position capabilities.
  - Impact to minimum ASA / Speed of Answer times
  - Acts of God

Contact from the CapTel Service Center Manager or designated CTI contact person will be made to the assigned contact people at Sprint immediately upon awareness of an outage meeting the above criteria, 24 hours a day, seven days a week including holidays with the following documentation:

1.) What time did the outage happen in CENTRAL TIME?

2.) What caused it?

3.) Which customers are (or were) impacted?

4.) What is (was) the solution to restore service?

5.) What is the time that service will be (or was restored by) IN CENTRAL TIME?

Sprint will internally escalate outages in the following manner:

Level	Escalation Procedure for Outages	Point of Contact (POC)	Contact Info:
1	Sprint Product Innovation Manager	Dennis Selznick Product Innovation Manager	913-663-7278 Dennis.A.Selznick@sprint.com After Hours: getdennis@gmail.com (pager) 913-231-1386 (cell)
2	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(608) 441-8800 Pam.Frazier@captelmail.com After Hours: 608-516-7517 (cell) 608-832-6233 (home)
3	Captioned Telephone Inc.'s (CTI) Call Center Vice President	Jayne Turner Vice President	(608) 441-8800 Jayne.Turner@ultratec.com After Hours: 608-274-0598 (home)

Table 44 – Sprint CapTel Outage Escalation

SPRINT PROCEDURE FOR OUTAGE NOTIFICATION TO CONTRACT ADMINISTRATORS

Upon receiving notification from CTI, Sprint will have one of the below managers contact the Contract Administrator, depending on availability:

	Point of Contact (POC)	Position	Contact Information:
1	John Moore	Relay Program Management Mgr	P: (925) 904-4014 M: (925) 895-9176 H: 925-968-1418 E: John.E.Moore@sprint.com Pgr: jmoore45@sprintpcs.com
2	Angela Officer	Relay Program Manager	P: (703) 689-5654 E: Angela.Officer@sprint.com
3	Assigned On-Call Relay Program Manager	Relay Program Manager	Assigned as necessary

Sprint Customer Notification Procedure

Upon receiving notification from CTI, Sprint will assess the problem and contact will be made by email to the Contract Administrator.

In cases of partial loss of service, such as several inoperable RO positions or, local area network outages, the CapTel Center on-site technician will notify CapTel Service Center to schedule repair. Only those partial losses of service that are service affecting in excess of 30 minutes will be emailed to the state Contract Administrator.

If the problem is within the CapTel call center, maintenance can usually be performed by the on-site technicians. Hardware spares are retailed at the CapTel call center to allow for the most common type of repair required without the ordering of additional equipment.

DISASTER RECOVERY FOLLOW-UP

Upon notifying customers of an outage, Sprint's contact person will provide regular updates from CTI to all customers and internal team members. The follow up will be kept in sync with CapTel Customer Service so that the information shared with customers from CTI is the same as what customers receive from Sprint.

DISASTER RECOVERY POST-MORTEM DOCUMENTATION

Within 72 hours (3 days) after the outage is resolved, CTI will provide a formal written analysis of the outage to the designated Sprint people (outlined above).

Sprint will send a document with the analysis to the Contract Administrator. John Moore will be the primary point-of-contact for the letter to be shared with customers. If John Moore is not available, then Angie Officer will provide the letter directly to customers.

1) What time did the outage happen in CENTRAL TIME?

2) What caused it?

3) Which customers are (or were) impacted?

4) What is (was) the solution to restore service?

5) What is the time that service will be (or was restored by) IN CENTRAL TIME?

6) What will CapTel, Inc do to prevent this from happening again?

CTI will be available to answer questions from Contract Administrators through Sprint.

TIME FRAMES FOR SERVICE RESTORATION

- Complete loss of service due to equipment

  - Normal business day – A technician is on site during the normal business day. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

- Outside of the normal business day – A technician will be on-site within four (4) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within two (2) hours.

- Due to Utilities or Disaster at the Center – Service will be restored as soon as the utility is restored provided the equipment was not damaged. If the equipment was damaged then refer to the timing in the statement previous (Due to Equipment).

- Due to Telco Facilities Equipment – A technician will be dispatched as necessary. The normal Telco escalation procedures for a partial outage will apply:

  - Two hours at first level,
  - Four hours at second level
  - Eight hours at third level

  These hours of escalation are all during the normal business day, so a trouble ticket may be extended from one day to the next.

- Partial loss of service – Due to Equipment

  - Normal business day – A technician is on site during normal business hours. The technician will provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.
  - Outside of the normal business day – A technician will be on-site within eight (8) hours. The technician will then provide parts and/or resources necessary to expedite repair of the most common problems within four (4) hours.

- Due to Position Equipment – A technician will be on-site within eight (8) hours, provided there are not enough positions working to process the forecasted traffic volumes. The technician will provide parts and/or resources necessary to expedite repair within 48 hours. If there are enough positions functional to process the forecasted traffic, the equipment will be repaired as necessary by Sprint.

- Due to Telco Facilities Equipment – A technician will be dispatched as necessary by Sprint. The normal Telco escalation procedures for a partial outage will apply:

  - Eight hours at first level
  - Twenty-four hours at second level

  These hours of Telco escalation are all during the normal business day, so a service request may be extended from one day to the next.

TROUBLE REPORTING PROCEDURES (FOR INDIVIDUAL CUSTOMERS TO CUSTOMER SERVICE)

All calls concerning customer service issues should be placed by dialing the CapTel Customer Service at 1-888-269-7477 (800-482-2424 TTY) in English (866-670-9134 for Spanish). A Customer Service agent will take information concerning:

- Callers Name
- Contact Number
- Calling to / Calling from if applicable
- Description of the trouble
- Customer service can also be reached by emailing captel@captelmail.com.

Report service affecting trouble to Customer Service during normal business hours. Escalations of service affecting issues during normal business hours are followed below:

Level	Escalation Procedure during business hours	Point of Contact (POC)	Phone Number
1	CapTel Customer Service	Customer Service Agent	(888) 269-7477 captel@captelmail.com
2	CapTel Customer Service Supervisor	Pam Holmes	(888)-269-7477 Pam.Holmes@captelmail.com
3	Captioned Telephone Inc.'s (CTI) Call Center Director	Pam Frazier Call Center Director	(608) 441-8800 Pam.Frazier@captelmail.com
4	Captioned Telephone Inc.'s (CTI) Call Center Vice President	Jayne Turner Vice President	(608) 441-8800 Jayne.Turner@ultratec.com

Table 46 – CapTel Customer Service Escalation Procedures

ALTERNATIVE USAGE FOR CAPTEL PHONE DURING OUTAGE FOR VCO USERS.

CapTel phones are equipped with the capability to connect to traditional relay services even in the event that the captioning service is not available.
In the event that a user cannot reach the captioning center, and the user desires to use any form of available relay to connect their call, the user can dial 7-1-1 (user must dial only 7-1-1 and not a relay 800 number in order to change to VCO mode) and be connected to the in-state relay call center. Their call will be processed via VCO instead of captions. In VCO mode, no audio from the called party will be processed – just like any other traditional VCO call

Appendix F:

Copy of TRS Contract

Page: 81

STATE OF OREGON
CONTRACT # 102-1522-10
FOR
TELECOMMUNICATION RELAY SERVICES
("Contract")

This Contract is between the State of Oregon ("State") acting by and through its Department of Administrative Services, State Purchasing Office ("DAS SPO") for the benefit of the Oregon Public Utility Commission ("Agency"), and Sprint Communications Company, L.P. ("Contractor"). This Contract is effective on the date it has been signed by all parties and all required State of Oregon approvals have been obtained. The initial Contract term will be for two (2) years ("Initial Term") with two (2) renewal options ("Renewal Term(s)"), each of a period of two (2) years, under which DAS SPO may extend this Contract subject to subsection 4.D. of this Contract. In addition, after the expiration of the six-year period contemplated by the Initial Term and two Renewal Terms, DAS SPO and Contractor may, by mutual written agreement, extend this Contract for additional time, up to a maximum of four (4) additional years ("Extension Term(s)"). In no event will the aggregate term (Initial Term, Renewal Terms and Extension Terms) exceed ten (10) years from the effective date of this Contract. The Initial Term and any Renewal Term(s) or Extension Term(s) are collectively referred to herein as the "term."

RECITALS

Agency desires to purchase Services through the Oregon Telecommunication Relay Service (OTRS) Program for Oregonians with speech and hearing disabilities throughout the State.

Contractor is a successful proposer in connection with the Request for Proposals (RFP) for Telecommunication Relay Service (TRS) and Captioned Telephone (CapTel) Relay Services.

Agency desires to engage Contractor to provide the Services described herein.

Contractor desires to perform the Services subject to the terms of this Contract.

AGREEMENT

In consideration of the foregoing recitals and the mutual terms and conditions set forth below, Agency and Contractor agree as follows:

1. CONTRACT DEFINITION OF TERMS:

Agency - means Public Utility Commission

Contract - means the entire agreement between the Contractor and the State, comprised of this Contract document, the RFP and the Contractor's Proposal. The RFP and the Contractor's Proposal are incorporated into and made part of this Contract by this reference.

Contractor - means the Entity with whom the State enters into a Contract setting prices for the purchase of Services pursuant to the terms and conditions of this Contract.

DAS SPO - means the Department of Administrative Services, State Procurement Office.

PUC - means the Public Utility Commission

Services - means the services to be performed under this Contract, as more fully described in the Statement of Services.

State - means the State of Oregon.

1.1 TECHNICAL DEFINITION OF TERMS:

7-1-1-The abbreviated dialing code for accessing most types of telecommunications relay service anywhere in the United States.

Abandoned Call - An incoming call reaching the TRS center but not answered by a Relay Operator .

ADA - Americans with Disabilities Act.

ASCII – An acronym for American Standard Code for Information Interchange, which employs an eight bit code and can operate at any standard transmission baud rate including 300, 1200, 2400 and higher.

American Sign Language (ASL) – A visual language based on hand shape, position, movement and orientation of the hands in relation to each other and the body.

ANI—Automated Number Identification (ANI). ANI is the telephone number of the line initiating a call. The number is identified by the switch and passed over the network to the Relay Operator workstation.

Answering Machine Retrieval – A feature that allows relay users to retrieve their answering machine message through the Relay Operator.

Average Speed of Answer (ASA) - ASA measures the time it takes the call to reach the Relay Operator position from the relay center call controller switch.

Baudot – a seven-bit code, only five of which are information bits. Baudot is used by text

telephones to communicate with each other, often at a 45.5 baud rate.

Conversation Minutes – Means the time period the relay originator is connected to the called party's number until the moment two parties disconnect. This includes an answering machine or voice menu. Billable Conversation Minutes do not include the time in queue (call is ringing, waiting for the call to connect to the other phone number), call set-up, call wrap-up, or calls that have reached numbers that are busy or receive no answer.

Blocked Call - Any call that arrives at the Contractor's switch, but is not answered due to a continuous ring, network (fast) busy signal and/or in queue (or any other form of holding a call that has reach the Contractor's network) for more than 90 seconds, while waiting for a Relay Operator to be connected to the call and begin to interact with the calling party.

Banding of Call Type – The ability to answer the incoming call based on the previous caller's communication mode (i.e. ASCII, HCO, Spanish, VCO, Voice or TTY). This is often done permanently.

Caller ID – When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

Call Set-Up - The time period when a Relay Operator connects to a relay originator to the moment the relay call is connected to the called party. This includes the preparation process (dialing, ringing, and status report). Once the caller and called party are connected, this ends the call set-up.

Call Wrap-Up - The time period when one of the two relay parties disconnects to the moment the Relay Operator disconnects the last party.

Call Duration - The time period when a relay call is recorded, which is the actual length of time between the set-up and the call wrap-up.

CDR - Call Detail Record.

Call Release – A feature that allows the operator to sign-off or be "released" from the telephone line after the operator has set up a telephone call between the originating TTY caller and a called TTY party, such as when a TTY user must go through a TRS facility to contact another TTY user because the called TTY party can only be reached through a voice-only interface, such as a switchboard.

Captioned Telephone (CapTel) Relay Service (CTRS) - A form of Telecommunication Relay Service (TRS) that involves a specially designed telephone with a text display. Rather than using TTY technology, the called party's speech is re-voiced by the relay operator, converted into text by a voice recognition system, and transmitted directly to the caller's display

telephone.

Relay Operator (also known as Communications Assistant) - A person who transliterates or interprets conversation between two or more end users of TRS.

Common Carrier or Carrier – Any common carrier engaged in interstate Communication by wire or radio as defined in section 3(h) of the Communications Act of 1934, as amended (the Act), and any common carrier engaged in intrastate communication by wire or radio, notwithstanding sections 2(b) and 221(b) of the Act.

Completed Outbound Call - An outbound call, which is answered by the called party. This includes calls answered by any person at the called party's number, as well as calls answered by an answering machine, voice mail or answered when forwarded from the called party's number to another location, such as another number.

Customer Database – A database that allows callers to enter specific information into a profile in order to expedite their call set-up time. Such information often includes the caller's name and address, long distance profile, frequently dialed numbers, out-dial message for identification purposes, call block, out-dial restrictions, emergency numbers and other customer notes.

Disconnected Call - An outgoing call in which the relay user or the Relay Operator terminates the incoming call before the called party answered.

FCC - Federal Communications Commission.

General Assistance Calls - The category of incoming calls not associated with an outgoing call attempt. Even though an incoming call may reach the relay service, no associated outbound call attempt can be made for reasons such as but not limited to:

a. the Relay Operator or the calling party cannot hear or read the other party due to technical problems,
b. the calling party may only be seeking information from the Relay Operator about relay or some other topic,
c. the calling party may have misdialed and did not intend to call OTRS, or
d. the calling party may have forgotten the number of the party he or she wishes to reach, etc.

GOS - Grade of Service

Hearing Carry Over (HCO) - A form of TRS where the person with the speech disability is able to listen to the other end user and, in reply, the Relay Operator speaks the text as typed by the person with the speech disability. The Relay Operator does not type any conversation.